



Customer Grievance Redressal Mechanism (CGRM) Policy

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Version Control:

Ver. no.	Effective From	Details of Amendment	Prepared / Proposed by	Approved by	Remarks
1	24.08.2020	Adoption of Customer Grievance Redressal Mechanism (CGRM) Policy	Company Secretary	Board	Last reviewed on 07.09.2019. Policy to be reviewed after 1 year
2	04-08-2021	Change in WTD name and of meeting periodicity.	RMFL Team	Board	Once in a year
3	29-10-2022	Integrated ombudsman scheme, toll free Help Desk and policy review periodicity.	RMFL Team	Board	To be reviewed on or before 28-10-2024
4	25-10-2024	SOP for review of complaints received at branches	RMFL Team	Board	To be reviewed on or before 24-10-2026

CUSTOMER GRIEVANCES REDRESSAL MECHANISM (CGRM) POLICY

The main objective of Repco Micro Finance Limited (RMFL) is to assist the poor women for their upliftment and help them build and manage their sustainable livelihoods. RMFL believes that customer is the central point of its activities and providing efficient customer service is essential not only to increase its outreach to newer clients, but also to retain existing clients for sustained business growth.

Customer Grievance Redressal Mechanism (CGRM) is recognized as an important tool to make a stronger connect with customers to address their queries, concerns and complaints and get insights into their needs, requirements and expectations.

The Fair Practice Code of RBI, as outlined in its Master Direction-NBFC- Systemically Important Non-Deposit taking Company and Deposit taking Company- PD.008 / 03.10.119 / 2016-17 dt 01.09.2016 (updated as on 17.02.2020), mandates the Board of the Company to lay down an appropriate grievance redressal mechanism within the organization and to review its functioning periodically.

Further in reference to CEPD/PRS.No.4535/13.01.004/2018-19 dt 26.04.2019 notification, RBI has extended the Ombudsman Scheme to non-deposit taking Companies and as per this RMFL shall ensure that the purpose of the Scheme and the contact details of the Ombudsman to whom the complaints are to be made by the aggrieved party are displayed prominently in all the offices and branches, in such manner that a person visiting the office or branch has adequate information of the Scheme. In addition to that The Reserve Bank - Integrated Ombudsman Scheme, 2021 effective from 12 November, 2021 by integrating the three existing schemes (i) the Banking Ombudsman Scheme, 2006; (ii) the Ombudsman Scheme for Non-Banking Financial Companies, 2018; and (iii) the Ombudsman Scheme for Digital Transactions, 2019., to adopt 'One Nation One Ombudsman' approach by making the RBI Ombudsman mechanism jurisdiction neutral.

The basic objective of the CGRM is to put in place a convenient, simple, transparent and effective system for speedy and efficient resolution of individual customer complaints and minimise instances of customer dissatisfactions.

This CGRM policy is based on the client protection principles that

- (i) the Company will treat all the complaints efficiently and fairly as they can otherwise damage the Company's reputation;
- (ii) Complaints raised by the clients must be dealt with courtesy and in time;
- (iii) All clients are fully informed of the avenues to escalate their complaints and
- (iv) the employees will work in good faith and without prejudice to the interests of the client.

This CGRM Policy framework broadly consists of the following:

Employee Orientation: Since customers greatly rely on employees to make use of our CGRM, the company will take steps to ensure that employees are sensitized about supporting the customers on different issues, which customers might face and hence, should be equipped with adequate information about CGRM. Components of CGRM and assessment of employee's knowledge on CGRM shall be included in the employees training modules (induction or refresher) to ensure that they shall be made broadly aware of the CGRM policy, responsibilities of different employees thereunder and acceptable Turn Around time (TAT) to resolve the various types of complaints. Parameters on CGRM will also be factored in the employee's performance appraisal, which will ensure that employees handle the customer issues with utmost care and as per the Company policy.

Standard Operating Procedure (SOP) for Review of Complaints Received at Branches

To establish a systematic approach for reviewing and addressing customer complaints received at branches, ensuring prompt resolution, compliance with regulatory requirements, and continuous improvement in customer service, the escalation matrix is provided in Annexure -2.

Customer Facilitation- Customer facilitation on CGRM through the following aspects is to ensure that customer knows and trusts CGRM of the Company and has fair and easy access to it.

Multiple channels- Customers will be provided with multiple channels to access to CGRM such as – complaints/suggestion drop-box at all our branches/ offices, Company's email addresses / landline numbers / postal addresses and contact address of Regional Office of RBI.

Training – Periodically, customers' understanding of the CGRM will be assessed and they will be made aware of our CGRM in-group meetings, in SHG/JLG orientation trainings, etc. The awareness about the CGRM shall be imparted throughout the customer life cycle.

Displays and Disclosure- The repeated displays and disclosures should serve the purpose of highlighting to the customers, the grievance redressal mechanism followed by the Company, together with details of the name and contact details of Company's Grievance Redressal Officer (GRO) and the Regional office of RBI. Hence, apart from oral disclosures (through trainings, employee interactions etc) and other company-level disclosures required by the law or other regulatory provisions like Company Website, Notice Board etc, the Company will disseminate Fair Practice Code, Effective Rate of interest, Customer Grievance Mechanism, details of loan products, ombudsman scheme, consumer education, awareness particulars will provide potential risks and threats involved in excess loan obligations and other awareness measures as suggested by RBI.

Complaint Escalation:

RMFL is committed to observing fair practices in all its business transactions and dealings with customers with utmost transparency and ethical standards. In case of any complaints /grievances the customers can make use of the following Grievances Redressal Mechanism set up by the Company, within the organisation as per escalation matrix mentioned below:

Level 1: (Branch Manager)

In case of a grievance, the customer can approach the Branch Manager (BM) and discuss the complaint/grievance issue. The contact number of the BM / field level staffs are displayed in the branch. The BM shall resolve the complaint/grievance within 5 working days from the date of receipt of the complaint.

Level 2: (Help Desk)

If the customer is not satisfied with the response received from the branch or if the customer does not receive a response in 5 working days, they can call our Help Desk Representatives available on the phone or write an e-mail to the below mentioned e-mail id to register your complaints.

Toll-Free Helpline Number: 1800 419 5177

(Timings: 10 a.m. to 6 p.m. except Saturday & Sundays)

E-mail: grievance@repcomicrofin.co.in

Level – 3 (GRO)

If the customer is not satisfied with the response receive at the branch level or Help Desk or does not receive a response, customer can write or contact:

Managing Director

Grievances Redressal officer (“GRO”)

Repco Micro Finance Limited,

No. 634, 2nd Floor, Karumuttu Centre, Anna Salai, Nandanam,

Chennai – 600 035. Tel no. 044-24310212

Email ID: grievance@repcomicrofin.co.in;

The complaint will be handled as per guidelines in this policy and the grievances will be resolved within 10 working days from the date of receipt of the issue/complaint matter by the GRO.

Level 4: Ombudsman

If a customer is not satisfied with the response or does not receive from GRO or Branch or Help Desk within 30 working days, the customer can contact or write to the following officer of RBI.

General Manager Department of Non-Banking supervision (DNBS), Reserve Bank of India, Fort Glacis, Rajaji Salai, Chennai – 600 001. Ph no. 044-25393406, Fax no. 044-25393797, Email D: ssmnbfc2che@rbi.org.in	Centralized Receipt and Processing Centre (CRPC) Reserve Bank of India, Central Vista, Sector 17, Chandigarh - 160 017 Web link - https://cms.rbi.org.in
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Governance Structure:

Grievance Redressal Committee

There will be a Grievance Redressal Committee (GRC) at Head Office with following officers.

1. Managing Director – (GRO)
2. Company Secretary
3. **Division Heads as suggested by MD.**

This committee will meet at least once in a quarter and will be chaired by the GRO.

The committee will peruse the individual complaints received and processed during the quarter. A statement consolidating quarterly customer service committees reporting to GRO shall also be placed to the committee. The committee will

- (i) evaluate complaints received channel-wise / category-wise and the redressal process during last quarter;
- (ii) peruse the feedback on the quality of customer service received from various quarters;
- (iii) ensure that all regulatory guidelines regarding customer service are adhered to;
- (iv) review the initiatives and measures taken by the Company for improving customer service. The summary of the minutes of the committee will be placed to the Board every quarter.

Categorization of complaints and Tracking of resolution status: To synchronise Company's quarterly SRO reporting on CGRM to Sa-dhan, all in-bound calls / communications are broadly categorised into

(A1) Queries, - Customer requirements which can be attended to and closed immediately, without requirement of further processing.

(A2) Service Requests - Customer requirements which need further processing and are not in the nature of the complaint.

(A3) Complaints.

- a. Deficiency in Promised action and services provided to the customers in writing
- b. Breach of agreed terms and conditions of the loan contract
- c. Wrong commitment and non-disclosure of material terms as defined in the Fair Practices Code.
- d. Action and behavior of the company employee and partner resulting in dissatisfaction/ financial loss / and where customers have cited facts of incident.

Complaints are further categorized into

(B1) Interest Rates,

(B2) Excessive Charges,

(B3) Recovery Practices,

(B4) Digital Transactions,

(B5) Updation of Repayment Records,

(B6) Updation / Dispute on data in Credit Information Report CIR),

(B7) Fraud by Employees,

(B8) Fraud by External Agencies and

(B9) Others.

Against each of these in-bound calls/ communications, the designation of the official concerned to whom it is to be escalated for resolution is as stated in Annexure-1.

Reporting: The Grievance Redressal Officer (GRO) at HO will place the above status of the grievances to the Board of directors for review.

Commencement & Review: This policy will come into effect immediately and the Board will review the CGRM Policy once in 2(two) years.

Any amendment(s) in the statutory/regulatory requirements suggested/notified by the Regulator(s)/Statutory bodies shall be superseding and deemed to be an amendment to this Policy and binding on the Company immediately and automatically.

Annexure-1**INTERNAL ESCALATION AND TURN AROUND TIME**

Sl No	Category of in-bound calls / communications	Official to whom it is to be escalated for resolution	Internal Benchmark TAT (No of Days)
A1	Queries	BM/HOD of HO Concerned	3 days
A2	Service Requests	BM/HOD of HO Concerned	15 days
A3	Complaints	BM/HOD of HO Concerned	15 days
B1	Interest Rates	HOD of HO Concerned	15 days
B2	Excessive Charges	HOD of HO Concerned	15 days
B3	Recovery Practices	BM/HOD of HO Concerned	15 days
B4	Digital Transactions	BM/HOD of HO Concerned	15 days
B5	Updation of Repayment Records	BM/HOD of HO Concerned	15 days
B6	Updation / Dispute on data in Credit Information Report (CIR)	IT Dept at HO	30 days
B7	Fraud by Employees	Business Head	15 days
B8	Fraud by External Agencies	Business Head	30 days
B9	Others	Depending upon the type	15 days

Standard Operating Procedure (SOP) for Review of Complaints Received at Branches

1. Receiving Complaints

- **Mode of Complaints:** Complaints may be received through various channels such as:
 - In-person (walk-in customers)
 - Email
 - Phone calls
 - Postal mail

2. Initial Review and Assessment

- **Assessment:** The branch manager or designated officer shall conduct an initial assessment of the complaint to determine:
 - Validity of the complaint
 - Urgency of resolution
 - Whether it can be resolved at the branch level or needs to be escalated.
- **Fraud or Critical Complaints:** Complaints related to fraud, security breaches, or regulatory violations should be escalated immediately to the Head Office and Compliance Team.

3. Resolution Process

- **Branch-Level Resolution:** For complaints that can be resolved locally, the following steps should be taken:
 - Assess the issue by reviewing relevant documents and interacting with the staff involved
 - Communicate with the customer to clarify any details and provide a potential resolution plan
 - Aim to resolve the complaint within 4 working days.
- **Escalation:** If the issue cannot be resolved at the branch, it should be escalated to the appropriate department or higher management within 3 days, with all relevant information.

4. Customer Communication

- **Updates:** The customer should be kept informed of the progress if there are delays or escalations.
- **Resolution Confirmation:** Once the complaint is resolved, inform the customer and confirm that the issue has been satisfactorily addressed. Obtain feedback if necessary.

5. Review and Feedback

- **Branch Manager Review:** The branch manager must review all resolved complaints as and when to identify any patterns, repeat issues, or areas for improvement.
- **Periodical Reporting:** A report summarizing complaints received, resolved, pending, and escalated should be submitted to the Head Office periodically as and when basis.
- **Trend Analysis:** Analyze complaint trends periodically to detect systemic issues or areas where service can be improved.

6. Escalation Protocol

- **Unresolved Complaints:** If a complaint remains unresolved beyond the standard resolution time, it should be escalated to the designated officer at the regional office.
- **Regulatory Escalation:** If a complaint pertains to regulatory compliance, it must be brought to the attention of the Compliance Officer for further review and resolution.

7. Compliance with Regulatory Guidelines

- Ensure adherence to all regulatory timelines for complaint resolution, including those mandated by the Reserve Bank of India (RBI) or other relevant authorities.
- Maintain proper documentation and evidence of resolution for audits and inspections.