

LAKME INVESTMENT AND FINANCE LIMITED

GRIEVANCE REDRESSAL POLICY

Version Control

Document version	Description of changes	Memorandum of change	Prepared by	Proposed by	Owner Dept.	Approval Date
1.0			Operations	Head of Operation	Operations	

Table of contents

1. Objective:	3
2. Introduction:	3
3. Categories of Customer Communication:	3
4. Mechanism to Handle Customer Grievances and Complaints:	3
5. Salient Features of Ombudsman Scheme for Non-Banking Finance Companies, 2021:	6
6. Responsibilities of the Company towards Ombudsmen Scheme 2021:	7

1. Objective:

The Grievance Redressal Mechanism Policy has been formulated as per Chapter VI of the Non-Banking Financial Company – Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016 (“Master Directions”) and the Ombudsman Scheme for Non-Banking Financial Companies, 2021 (“the Scheme”) issued by the Reserve Bank of India (RBI).

2. Introduction:

This policy on Customer Grievance Redressal of Lakme Investment and Finance Limited (“Lakme” or “the Company”) is established as a mechanism within the organization to enable customers to lodge their complaints/grievances or provide feedback/suggestions regarding their dealings with Lakme, including financial assistance being considered for them. This policy aims to address these concerns in a time-bound manner, adhering to the provisions provided herein (the Customer Grievance Redressal Policy).

3. Categories of Customer Communication:

- a. **Query** – General inquiries related to Lakme loans, interest rates, repayment terms, eligibility norms, categories of loans, eligibility criteria for enrollment, terms of financing/refinancing, etc.
- b. **Request** – Requests for obtaining valid services, including financing or refinancing support directly from Lakme.
- c. **Grievance** – Communication by prospective/existing customers expressing dissatisfaction due to lack of action or inadequate quality of services by Lakme.
- d. **Grave/Urgent Grievance** – Concerns related to staff misbehavior, cheating/fraud, false commitments, misconduct with customers.
- e. **Suggestion/Feedback** – Comments related to the functions/roles of Lakme with respect to its operations, policies, or practices.

4. Mechanism to Handle Customer Grievances and Complaints:

In case of any grievance, customers can record their complaints/grievances for resolution in the following manner:

a. Registration of Complaints with the Company:

- **Email/Letter** – Customers can send their grievance through email. Customers should ensure that they quote their application number, sanction number, or loan account number in every correspondence with the Company regarding their complaint.
- Anonymous complaints will not be addressed as per this Customer Grievance Redressal Mechanism.
- The customer may register their query/complaint with the Company, which shall be addressed to the Grievance Redressal Officer (GRO) concerning any matter related to business practices, lending decisions, credit management, recovery, and complaints regarding updating/alteration of credit information. The details of the Grievance Redressal Officer are provided below:

b. Escalation of Complaints to Ombudsman:

- If a customer is not satisfied with the resolution provided by the Company or if the complaint/dispute is not redressed within a period of one month, the customer may lodge a complaint to the NBFC Ombudsman of RBI under whose jurisdiction the Registered Office of Lakme falls. The contact details of the NBFC Ombudsman and procedure are as follows:

S No.	Centre	Address of the Office of NBFC Ombudsman	Area of Operation
1	Chennai	C/o Reserve Bank of India Fort Glacis, Chennai 600 001	Tamil Nadu, Andaman and Nicobar Islands, Karnataka, Andhra Pradesh, Telangana, Kerala, Union Territory of Lakshadweep and Union Territory of Puducherry

c. Procedure to file complaint to Ombudsman:

i. Initial Steps:

- Attempt to resolve the issue directly with the concerned Regulated Entity by lodging a written complaint.
- Wait for a response for 30 days. If the response is unsatisfactory or not received, proceed to the next step.

ii. Filing the Complaint:

- **Online:** Lodge the complaint through the RBI's Complaint Management System (CMS) at <https://cms.rbi.org.in>.
- **Electronic/Physical Mode:** Submit the complaint through email or postal service to the Centralised Receipt and Processing Centre of the Reserve Bank of India.
- Ensure the complaint is signed and includes all necessary details and documentation as specified in the format provided by the Reserve Bank.

iii. Processing of the Complaint:

- Complaints of a suggestive nature or seeking guidance will be closed with a suitable communication.
- Non-maintainable complaints will be identified and communicated to the complainant.
- Valid complaints will be forwarded to the relevant Ombudsman office and the Regulated Entity for further action.

iv. Resolution:

- The complaint is deemed resolved when:
 - i. It is settled by the Regulated Entity with the complainant upon the intervention of the Ombudsman.
 - ii. The complainant agrees in writing or otherwise that the resolution is satisfactory.
 - iii. The complainant withdraws the complaint voluntarily.

- If unresolved, the Ombudsman may pass an Award considering all relevant facts and regulations.

5. Salient Features of Ombudsman Scheme for Non-Banking Finance Companies, 2021:

a. Grounds for filing a complaint by a customer:

- Failure to meet commitments or standards in providing financial services.
- Non-adherence to instructions provided by the Reserve Bank of India.
- Disputes over charges levied without proper disclosure.
- Issues related to loans and advances.
- Delays in the provision of services such as the issuance of cards or the transfer of funds.

b. Non-maintainability of Complaints: A complaint will not be entertained if it falls under any of the following categories:

- Complaints related to the commercial judgment or decision of a regulated entity.
- Disputes between a vendor and a regulated entity concerning an outsourcing contract.
- Grievances that are not addressed to the Ombudsman directly.
- General grievances against the management or executives of a regulated entity.
- Disputes where actions are initiated by a regulated entity in compliance with the orders of a statutory or law-enforcing authority.
- Complaints about services that do not fall within the regulatory purview of the Reserve Bank.
- Disputes between regulated entities.
- Disputes involving the employee-employer relationship within a regulated entity.
- Disputes for which a remedy is provided under Section 18 of the Credit Information Companies (Regulation) Act, 2005.
- Disputes pertaining to customers of a regulated entity not included under the Scheme.

c. Other Conditions:

- The complainant must have made a written complaint to the concerned Regulated Entity and either received an unsatisfactory reply or no reply within 30 days.
- The complaint must be lodged within one year of receiving the reply from the Regulated Entity, or within one year and 30 days if no reply is received.
- The complaint must not be sub-judice, i.e., pending before or already decided by a court, tribunal, or arbitrator.
- The complaint should not be frivolous or vexatious.
- The complaint should include complete information as specified by the Scheme.

6. Responsibilities of the Company towards Ombudsmen Scheme 2021:

The Company shall have the following responsibilities towards Reserve Bank- Integrated Ombudsman Scheme 2021.

- a. Service Complaints:** The Company Lakme NBFC must address any complaints from customers regarding deficiencies in service. This includes any shortcoming or inadequacy in any financial service which Lakme NBFC is required to provide statutorily or otherwise.
- b. Complaint Processing:** Lakme NBFC is responsible for ensuring that complaints made by customers are processed in a timely and efficient manner. The complaints can be made in writing or through other modes, alleging a deficiency in service and seeking relief.
- c. Settlement and Mediation:** Lakme NBFC must participate in the resolution process prescribed by the Ombudsmen, including facilitation, conciliation, or mediation, to settle complaints amicably.
- d. Compensation for Losses:** Lakme NBFC should compensate the complainant for any consequential losses suffered due to deficiency in service. The Ombudsman has the power to award compensation up to Rupees 20 lakh for financial losses and up to Rupees One lakh for the loss of the complainant's time, expenses, and mental anguish.
- e. Compliance with Awards:** Lakme NBFC must comply with the awards passed by the Ombudsman. If the Ombudsman provides a resolution, Lakme NBFC should implement it accordingly.

- f. Reporting and Transparency:** Lakme NBFC is required to provide necessary information and reports to the Reserve Bank of India as directed. The Ombudsman shall send an annual report containing a general review of activities, which may be published by the Reserve Bank in the public interest.
- g. Non-Maintainability of Complaints:** Lakme NBFC should be aware of the grounds on which complaints may not be maintainable under the Scheme. This includes complaints involving commercial judgment/decision, disputes with vendors, grievances not addressed to the Ombudsman directly, disputes involving regulatory compliance, and more.
- h. Customer Awareness:** Lakme NBFC must ensure that customers are aware of their rights to file complaints and the process for doing so under the Ombudsman Scheme.