



Centrum Microcredit Limited

Customer Grievance Redressal Policy

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Introduction

Pursuant to the requirement of the Fair Practices Code, the Board of Directors of applicable NBFCs are required to lay down the appropriate grievance redressal mechanism within the organization. Further, NBFC - MFI are required to prominently display the grievance redress system/ mechanism in all its offices and in the literature issued by it (in vernacular language) and on the website.

Also, providing excellent customer service on a regular and consistent basis is very important for the organization's sustained growth. Complaint handling is an important activity of any customer facing organization. Despite care in services, negative customer experiences inevitably do occur and must be handled correctly.

At the same time, we, at Centrum Microcredit Limited ("the Company" / "CML"), believe that quick and effective handling of complaints as well as prompt corrective & preventive actions to improve product features and processes are essential to provide excellent customer service to all segments of customers.

A well planned and well executed complaints handling process delivers the following benefits:

- customer satisfaction and retention;
- organizational learning for product, services and processes improvement;
- improvement in profits and/or cost structures; and
- enhanced customer satisfaction

Objective

The Policy shall *inter alia* achieve compliance with the procedure on grievance redressal as outlined in the Guidelines on Fair Practices Code for NBFCs.

The document stipulates an effective and suitable mechanism for receiving and addressing complaints from customers with specific emphasis on resolving such complaints fairly and expeditiously regardless of the sources of the complaints. The objectives of the policy are:

- All customers are treated fairly and in an unbiased manner/ without bias at all times
- To guide customers who wish to lodge a formal complaint and also provide guidance on the step by step procedure to be followed in case the customer is discontent/ unhappy with the response or resolution
- To enlist various types of modes through which customers can register complaints
- To create effective processes to respond to customer grievances/complaints
- To define escalation levels in case customer's complaint is not addressed at all or was not addressed satisfactorily
- To define timelines for closure of complaints

Scope

The processes contained in this document are applicable to all branches, offices and locations of CML across the country and to all activities where there is an interaction with customers. The document contains two sections:

- Capturing grievances of the customers
- Resolving the customer grievances

Section I - Capturing Customer Grievances

It is endeavor of the Company to ensure customer satisfaction by following standard norms and practices, so that complaints from customers are minimized. The Company has also adopted 'Fair Practices Code' to ensure that customers don't feel harassed or discriminated.

Modes of Complaints

However, in the case of deviation from standard norms and practices, and non-adherence to Fair Practices Code, customer has the following modes to capture the complaint:

- Customer Walk-in
- E-mail
- Letter
- Grievance Redressal Officer
- Micro Finance Institution Network (MFIN)
- Complaints through Reserve Bank of India/ NBFC Ombudsman (if not resolved/ if the customer is not satisfied with the resolution given by the Company)

Visibility

Information about how and where to complain would be publicized through a variety of service delivery points including websites, offices at all location and welcome letters. Front-office staff should be aware of the complaint handling process and the contact details of the organisation's Customer Grievance Redressal Officer and modes through which the customer can register a complaint.

Contact details for registering complaints should be displayed on the Notice board at each branch.

Website address - to be mentioned on the relevant communication sent to customers.

Contact details of RBI Non-Banking Supervision Department office where the customer can appeal if complaint registered with the Company has not been resolved past 30 days or if the customer is not satisfied with the resolution should also be displayed on the Notice Board at the branch and on website.

Accessibility

Customer Walk-in

Customers can visit and lodge their complaint in any CML office. All branches will have a complaint register and a complaint/suggestion box. The customer can write down his/her complaint in the register or drop it in the box. The complaint/suggestion box can be accessed only by the designated officials.

Designated official/s have to attend the customer and try to resolve the problem at the branch level itself, if possible.

The official records the Complaint appropriately describing the nature of the complaint accurately. The complaint thus registered will flow to the Grievance Redressal Officer (GRO). Acknowledgement of complaint received will be given to customer by official recording the same.

E-Mail

E-mail ID of GRO will be displayed on Company's official website. Customers can write to this designated E-mail ID and lodge official complaint with the Company.

GRO will be in charge of all the complaints marked to this designated E-mail ID. On receipt of the e-mail, GRO will log the complaint in the Complaint Register. Complaint will be forwarded by GRO to the concerned person for resolution.

Letter

Customer also has an option of writing a letter addressed to GRO as per details given on website and branches/offices/correspondence.

The complaint will be directed by GRO to concerned branch or department for resolution and will be escalated to higher level in case of delay in resolution.

Telephone Nos/Mobile Nos of GRO

Customers can lodge a complaint by way of phone to the GRO on the numbers provided by CML. The designated phone number will be displayed on the Company's website, loan cards/passbooks etc.

The designated officials receiving the phone calls on the given numbers will politely address customer and will accept the complaint on phone. The designated official will capture the customer complaint in the Complaint Tracker. The complaint will be directed to concerned team for resolution. MIS of complaints so assigned to various branches/offices, operations, etc is forwarded to GRO next day by the receiving officer.

Complaints received through MFIN (Micro Finance Institution Network)

Customer can register his complaint on toll free number with MFIN 18001021080 if any complaint reported to the company has not been resolved within a period of 21 days from the date of lodging the complaint with the Company or if the customer is not satisfied with the resolution provided for complaint made by him/her.

Complaints received through RBI DNBS

Customer can register his complaint with the Officer-in-Charge of the Regional Office of DNBS (Department of Non-Banking Supervision) of RBI if any complaint reported to the Company has not been resolved within a period of one month from the date of lodging the complaint with the Company or if the customer is not satisfied with the resolution provided for complaint made by him/her.

The Ombudsman on behalf of the aggrieved customer will register the complaint with compliance cell of the Company. All such complaints will be forwarded by the compliance cell to GRO.

The complaints should be acknowledged promptly (within T+1 day from the date of receipt of the complaint). Complete details of the case should be communicated in the correspondence.

The complaint should also be logged in the complaint register for record purpose.

GRO should investigate the matter and resolve the matter within the specified time line and the resolution should be communicated to the ombudsmen.

If the matter is complicated and GRO is not empowered to take decisions relating to the issue, then a detailed report giving an insight of the issue, addressing the inadequacies in the process or policy if any, suggesting/recommending appropriate solution to the problem must be submitted to one level higher/ CMLRisk.

Based on the decision or remedy received from the decision making committee/official, appropriate action should be taken and communicated to the Compliance Cell, who in turn will communicate the resolution of complaint to the Ombudsman. Care should be taken that the issue is resolved within the TAT communicated. If there is a possibility of delay in resolving the matter, then the same should be informed to Ombudsmen along with the revised timeline.

Customer Service Personnel

The key responsibilities of Customer Service personnel are:

- Monitor resolution of customers' complaints within TAT of 7 days and do necessary follow-up with concerned officials. Escalate the complaint to higher level when needed
- Attend complaint/s forwarded by the Reserve Bank on priority basis. Forward the status to Compliance cell on resolution of complaint/s.
- Maintain data base of complaints received and closed. Submit periodic report to the Grievance Redressal Officer (GRO) if there are complaints.
- Make suggestions to GRO for improvement in customer service quality by analyzing type of complaints received. Make suggestion for improvements in existing processes.

Section II – Customer Grievance Redressal Guidelines

- It is extremely essential that all the complaints lodged should be efficiently, effectively and timely resolved.
- Complaints received from the customers through various channels will be first logged in the Complaint Register by GRO.
- The complaint will then be forwarded to appropriate person in concerned office/department/branch.
- Concerned official will understand the background of the issue; check the identity of the customer with that in the systems.
- If required, he/she will contact the customer to understand the exact problem or to gather more information. He will co-ordinate with other departments/ team if their assistance or intervention is required in resolving the issue
- Said official will resolve the issue, communicate resolution to customer. E-Mail needs to be sent to GRO forwarding resolution of complaint.
- GRO will close the complaint in the Complaint Register.
- TAT for resolution will be 7 days from receipt of complaints.
- If complaint cannot be resolved within 7 days, then Customer Service personnel must respond to customer that his complaint is being investigated and that the Company will respond within next 7 days. It is necessary that GRO must be kept informed.

Escalation Matrix

For Details on Grievance redressal Matrix, kindly refer to the document “Grievance Redressal Matrix & Salient Features of the Ombudsman scheme” uploaded on the website of the Company/available at the branches.