GRIEVANCE REDRESSAL POLICY OF SHIVAKARI FINANCE PRIVATE LIMITED ("SFPL")

SUMMARY OF THE POLICY

Policy Name	**Grievance Redressal Policy**
Issue and Effective date	19 April 2025
Date of next review	Within in 12 months from effective date
Periodicity of review	**Annually**
Owner / Contact	**Compliance Department**
Approver	**Board of Directors**
Annexure	-

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1. INTRODUCTION

Serving customer needs satisfactorily is a top corporate priority for **SHIVAKARI FINANCE PRIVATE LIMITED** (**henceforth referred to as "Company" or "SFPL**").

An important component of this priority is designing an efficient mechanism to address customer queries and issues.

This policy on Grievance Redressal of **SHIVAKARI FINANCE PRIVATE LIMITED** (**henceforth referred to as "Company" or "SFPL**") is set out as a mechanism to enable the customers of the company to file their complaints or grievances or give their feedback and suggestions in relation to their dealings with the Company and to address the same promptly, by following the provisions as laid down herein.

This Grievance Redressal Policy describes the various channels available to the Company's customers for lodging their complaints, obtaining the right redressal solutions from the concerned department and the Company's mechanism for responding to customers within the stipulated time period.

The company has laid down Grievance Redressal Policy (the "Policy") on the basis of guidelines on Fair practice code and master direction of Non-Banking Financial Company – Non-Systemically Important Non-Deposit taking Company (Reserve Bank) Directions, 2016 dated September 1, 2016 issued by Reserve Bank of India (RBI).

Since RBI would issue circulars and instructions on an ongoing basis, any subsequent amendment to the above circular would update in the Policy accordingly.

2. OBJECTIVE OF THE POLICY

The company believes in providing prompt and efficient services to not only attract new customers but also retain existing ones. With this objective of serving its customers in a time-bound and efficient manner, the Company has drafted this Grievance Redressal Mechanism. The Company's policy, on grievance redressal has been formulated taking into account the following objectives.

The Company's policy, on grievance redressal, has been formulated taking into account the following objectives:

- To treat each customer fairly and equally at all times.
- To deal with any complaints raised by customers with courtesy and without undue delay.

- To handle the grievances of pensioners physically challenged and senior citizens on priority basis.
- To inform all customers about the various avenues to escalate their complaints/grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with the response of the company to their complaints.
- To deal with all the complaints efficiently and fairly to protect the reputation and business.
- To ensure that the Company's employees work in good faith and without prejudice in the best interest of the customers.

In order to make the Company's redressal mechanism more meaningful and effective, a proper structure shall be implemented to ensure that the redressal sought is fair and within the given framework of rules and regulations of the Company.

The customer shall have the right to register his/her complaint if he/she is not satisfied with the services provided by the company or any other agencies associated with the company.

At **SFPL**, customer service and satisfaction shall be the primary objective. Our constant efforts to ensure utmost client satisfaction will ensure that the redressal sought is just and fair and is within the given framework of rules and regulations.

3. SCOPE OF THIS POLICY

The grievance redressal processes contained in this Policy are applicable to all employees (permanent as well as contractual) and offices of the Company and to all activities where there is an interaction with prospective or existing customers.

A "***Customer***" is a person or entity that has availed a loan facility from the Company.

A "***Complaint***" is an expression of dissatisfaction or resentment either in the form of a representation or an allegation made in writing or through an approved electronic channel containing a grievance alleging deficiency in the following areas:

- Services, products, policies, and procedures of the Company;
- Employee behavior towards the customers of the Company; and
- Confidentiality and protection of the personal (including sensitive personal information) and financial information of the Company's customers.

4. CORE COMMITMENTS

The Company is committed to its objective of ensuring the highest levels of customer satisfaction and has, therefore, set out the following guidelines to be followed for redressal of each complaint by its customers:

To act fairly and reasonably in all dealings with its customers by ensuring that:

- All products and services meet relevant laws and regulations, as applicable from time to time;
- Customer dealings are honest and transparent; and
- The process and procedures of the Company are in the best interest of its customers.

To assist customers in selecting financial products and services by:

- Providing relevant information in English and/or a local language of choice;
- Explaining the financial implications of any product and service; and
- Allowing the customer to choose the one that meets his/her needs.

To make every attempt to ensure that the customers have a trouble-free experience while dealing with the Company and its employees.

In case of errors of commissions and/or omissions, the Company will deal with the same on priority by:

- Correcting mistakes;
- Addressing customer complaints;
- Guiding the customer on the escalation process in case of any dissatisfaction; and
- Reversing any charges including interest applied to a customer's account due to an error or oversight by the Company.

5. GROUND OF FILING COMPLIANTS

Customer can file/register compliant(s) on the following grounds mentioned under clause 8 of Ombudsman Scheme for NBFCs, 2018 In writing containing the nature of grievance/deficiency, inter alia, with regard to:

i. Failure to convey in writing, the amount of loan sanctioned along with terms and conditions including annualised rate of interest and method of application thereof;
ii. Failure or refusal to provide sanction letter/ terms and conditions of sanction in vernacular language or a language as understood by the borrower;
iii. Failure or refusal to provide adequate notice on proposed changes being made in sanctioned terms and conditions in vernacular language as understood by the borrower;

iv. Failure or inordinate delay in releasing the securities documents to the borrower on repayment of all dues; i) levying of charges without adequate prior notice to the borrower/ customer; j) failure to provide legally enforceable built-in repossession clause in the contract/ loan agreement;

v. Failure to ensure transparency in the contract/ loan agreement regarding (i) notice period before taking possession of security; (ii) circumstances under which the notice period can be waived; (iii) the procedure for taking possession of the security; (iv) a provision regarding final chance to be given to the borrower for repayment of loan before the sale/ auction of the security; (v) the procedure for giving repossession to the borrower and (vi) the procedure for sale/ auction of the security;

vi. Non-observance of directions issued by Reserve Bank to the non-banking financial companies;

vii. Non-adherence to any of the other provisions of Reserve Bank Guidelines on Fair Practices Code for Non-Banking Financial Companies.

6. COMPLAINT FILING CHANNELS

Customers can raise their complaints through the following means:

1. By sending a letter at the Company's office address at

   SHIVAKARI FINANCE PRIVATE LIMITED

   C-8/8825, Vasant Kunj New Delhi South West Delhi DL 110070 INDIA

   10:00 a.m. and 7:00 p.m., from Monday to Saturday (except on public holidays);

2. By lodging in person at **C-8/8825, Vasant Kunj New Delhi South West Delhi DL 110070 INDIA**
3. By writing an email to the company's dedicated email ID sfpl@shivakarifinance.co.in
4. Via a telephone call on the helpline number **011-45517612** between 10:00 a.m. and 7:00p.m.; from Monday to Saturday (except on public holidays); or

Each customer will be required to provide the following information while raising a complaint through any of the above-mentioned channels:

- Customer's full name as mentioned in the Loan Application Form submitted to the Company;
- Customer Identification number if any
- Customer's complete correspondence address as specified in the Loan Application Form and other documents;
- Unique reference number allotted while registering to complain.

- Loan Member ID (MID) Number;
- Registered mobile number;
- Email ID.

Once a complaint has been lodged through any of the channels mentioned above then such complaint will be handled by below-mentioned procedures:

a. Whenever a complaint mail is received, the sender receives a response back within three working days acknowledging his/her complaint.
b. **SFPL** representative calls/contact customer at the earliest to find out the exact nature of his/her complaint and provide a unique complaint number for future reference purposes.
c. After ascertaining the nature of the compliant **SFPL** representative forward such complaint to the respective department and ask for resolution.
d. Within in below-mentioned timeframe **SFPL** representative provides the complete resolution or request for the time period required due to the complexity and nature of the complaint.
e. Once the complaint will be resolved feedback department makes a call to the customer for the inquiry customer experience of resolution.
f. After getting the feedback **SFPL** representative report to the concerned department and close the complaint number or re-opens the complaint number as may be applicable.

7. GRIEVANCE REDRESSAL TIMEFRAME

The timeframe for addressing and resolving a complaint shall differ on a case-to-case basis, and depend upon the type and complexity of the grievance. The timelines for redressal of different kinds of complaints under this Policy is as follows:

- General cases (other than the cases mentioned below). These include customer complaints pertaining to business practices, lending decisions, credit management, recovery and complaints relating to updating/altering credit information, etc.: **15 working days of receipt of complaint**.
- Fraud cases, legal cases and cases which require retrieval of old records and documents: **30 working days of receipt of complaint**.
- Credit-related cases: **25 working days of receipt of complaint**.
- EMI Related issue Cases: **20 Working days from the date of receipt of complaint**.

If any complaint needs additional time to reach a resolution, the Company will inform the complainant of the requirement of additional time and the expected timeline for the resolution of the issue.

8. PROCESS TO HANDLE CUSTOMER COMPLAINTS / GRIEVANCES

All disputes / complaints arising out of the decisions of the Company's functionaries would be heard and disposed of at least at the next higher level after it is brought to their notice. Therefore, the following 'Grievances Redressal Mechanism' is put in place.

Level 1: Branch / Place where Business is transacted Level Review

A customer should either make a written complaint addressed to the relevant Branch Manager (contact details for the Company's branches/ places where business is transacted are on the Company's website), call the Company at **011-45517612**, or email the Company at **sfpl@shivakarifinance.co.in**

The Branch / places where business is transacted will strive to provide an initial response to the customer's complaint within 7 days of the complaint being lodged.

Level 2: Grievance Redressal Officer

In case the customer is not satisfied with the response received at Step 1, i.e., the Branch, he /she can escalate the complaint to SFPL Grievance Redressal Officer, whom the Company has appointed for the implementation of customer service and complaint handling. The Grievance Redressal Officer's complete contact details are given on the following page:

Name of the Grievance Redressal Officer	**Mr. Mukesh Arora**
E-mail ID	mukesharora@shivakarifinance.co.in
Contact no.	**011-45517612**

Once the complaint is escalated, the complaint will receive a response within 7 working days of it reaching the Grievance Redressal Officer.

Level-3: Compliance officer

In case the customer is still not satisfied with the response or has not received a response from the Company within 15 days from the date of his/her initial complaint, he/she may contact the Company's Compliance officer at the email id arunmadan@shivakarifinance.co.in or phone number (91) 011-45517612

Name of the Compliance officer	**Arun Madan**
Contact No.	**011-45517612**
E-mail ID	**arunmadan@shivakarifinance.co.in**

Once the complaint is escalated, the complaint will receive a response within 7 working days of it reaching the Compliance officer

9. ESCALATION OF COMPLAINT TO RESERVE BANK OF INDIA

In case the complainant does not receive a response from the Company within reasonable time or if a customer is dissatisfied with the response received at all levels, the complainant may approach the Reserve Bank of India at the following address:

If the complaint does not receive a response from the Company within a period of 1 month or if a customer is dissatisfied with the response received at all levels, the complainant may approach the Reserve Bank of India at the following address:

6, Sansad Marg,
New Delhi - 110001, India.
Tel: +91-11-23325225
Fax: +91-11-23711250
Email: rdnewdelhi@rbi.org.in

10. RESOLUTION OF CERTAIN SPECIFIC GRIEVANCES

Grievances related to behavioural aspects

Such complaints will be handled courteously, sympathetically and above all swiftly. Misbehavior/rude behavior with customers shall be treated at a Zero tolerance level and immediate action shall be taken. The Company, under no circumstances, shall tolerate misbehaviour of any degree by staff members.

Grievances relating to transactions/operations

Primarily, the company's customer care department shall be responsible for the resolution of complaints/grievances in this category. The office shall be responsible for ensuring rectification of entry/transaction or satisfaction of customers. It shall be the foremost duty of the branch to see that the complaint is resolved to the customer's satisfaction and if he is not satisfied, then to provide him with alternate avenues to escalate the issue. In case, it is not getting resolved at the branch level, they shall refer the case to Head Office for guidance/resolution.

11. REPORTING

All customer complaints received by the Company will be duly tracked, consolidated, and recorded, and a complete report will be presented to the board of directors on a quarterly basis.

12. REVIEW OF GRIEVANCE REDRESSAL POLICY

The compliant review Team accumulates all the complaints on yearly basis and reviews the process, functioning, and effectiveness of the grievance redressal mechanism and presents the report to the board of directors and suggest changes, if any, required for making the mechanism more efficient and timely and on the basis of suggestions and recommendations the Policy will also be reviewed by the Board at the first meeting of the Board of Directors of each financial year.