

VALUVANADU CAPITAL LIMITED

GRIEVANCE REDRESSAL POLICY

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Policy Owner : **HOD, Marketing Credits**

Prepared by : **Marketing Department**

Approved by : **MD, WTD & CFO**

GRIEVANCE REDRESSAL POLICY

1. Objective of Grievance Redressal Policy

Customer complaints constitute an important voice of customer, and Valuvanadu Capital Limited ("Company" or "Valuvanadu") has framed the Policy to lay down the framework for minimizing and resolving instances of customer grievances through proper redressal mechanism.

As per the extant guidelines of the Reserve Bank of India (RBI), all NBFCs are required to ensure that a suitable mechanism exists for receiving and addressing complaints from its customers / constituents with specific emphasis on resolving such complaints fairly and expeditiously regardless of source of the complaints.

The Company's Grievance Redressal Policy fulfils the following principles:

Customers shall be treated fairly at all times:

- Complaints raised by customers shall be dealt with courtesy and resolved in a timely manner.
- Customers shall be informed of avenues to escalate their complaints within the organization, and their rights in cases when their complaints are not resolved in a timely manner or when they are not satisfied with the resolution of their complaints.
- To comply with the regulatory guidelines as required for this function.

2. Basis

The Grievance Redressal Mechanism Policy has been made with an intention to provide for a system of redressal of complaints against deficiency in services **concerning debt instruments**, loans and advances and other specified matters, related to the Company and in compliance with the Master Directions of the Reserve Bank of India.

3. Grievance Redressal Mechanism process

In case of any grievance, customers can intimate and record their complaints / grievances for a resolution in the manner detailed below:

A) Registration of Complaints.

The Company shall enable registration of complaints by Customers through multiple channels. The various channels available to customers are as under:

- a. Over dedicated phone,
- b. Branch - Customers can visit the Branch Office for registration of their grievances. Oral complaints, if any should be followed by submission of a written complaint;
- c. Designated e-mail ID: Customers can send an email for redressal of their Grievance
- d. on-line (i.e., on the website of the Company),
- e. by directly contacting the Grievance Redressal Officer / In Person at the Administrative/Registered Office of the Company and the Customers can speak to the officials in-charge at the Registered Office of the Company for resolution of their issues or register their grievances at the Office. Customers can reach out directly to the Grievance Redressal officer over phone and / or designated e-mail.

Customers shall ensure that they quote their application no. / sanction no. / loan account no. in every correspondence with the Company regarding their complaint. Anonymous complaints will not be addressed in terms of this Customer Grievance Redressal Mechanism.

B) Recording and tracking of Complaints:

For recording and tracking the Complainants from the borrowers / customers, the Company shall maintain the Complaints Register wherein all the complaints received by the Company shall be recorded and tracked for end-to-end resolution, and Complaint MIS which shall be placed before the Management of the Company on a monthly basis.

C) Resolution of Complaints:

The department and business heads are responsible jointly and severally for resolution provided by their teams and for closure of customer issues.

D) Time frame for response and Complaints Redressal:

For responding and resolving, a complaint following Turn-Around Time (TAT) will be followed.

Sr.No	Types of Complaints	Complaints Redressal time period
1.	Normal cases (other than the one mentioned below):	10 working days
2.	Fraud cases, Legal cases and cases which need retrieval of documents and exceptionally old records:	15 working days
3.	EMI, Interest and Accounts related cases	20 working day
4.	Cases involving 3rd party (other Banks or financial institutions or dealership or if customer out of country or gold auction related)	30 working days
5.	Complaints received from the regulator	Within timelines as may be mandated by the respective regulator

If any case needs additional time, the Company will inform the customer/regulator requirement of additional time with expected timelines for resolution of the issue.

4. ESCALATION MATRIX:

In order to effectively understand and address customer grievances, the Company shall open multiple channels of communication. These modes will be adequately displayed on notice board of the Branch.

A) Designated officer as may be identified by senior management as Nodal officer (NO) for resolving customer complaint. His details are as follows:

NAME	CONTACT NUMBER	EMAIL ADDRESS
Mr. Sudhin K	7594900299	complaints@valuvanaducapital.com

(Between 10:00 a.m. and 06:00 p.m. from Monday to Friday except on public and Banking holidays).

B) If any customer is not satisfied with the resolution provided by the Nodal officer (NO), then escalation can be made to the Grievance Redressal Officer (GRO). Her details are as follows:

NAME	CONTACT NUMBER	EMAIL ADDRESS
Mrs. Jeena Sunny	7594900277	grievance@valuvanaducapital.com

(Between 10:00 a.m. and 05:00 p.m. from Monday to Friday except on public and Banking holidays).

C) If any customer is not satisfied with the resolution provided by the Grievance Redressal officer, then escalation can be made to the NBFC Ombudsman at the below mentioned address:

Shri Satwant Singh Sahota
 C/o Reserve Bank of India,
 06, Sansad Marg, New Delhi
 STD Code: 011
 Tel. No. 23313359

The NO shall be responsible, inter alia, for representing the covered NBFC before the Ombudsman and the Appellate Authority under the Scheme. The NO appointed at the Head Office of the NBFC shall be responsible for coordinating and liaising with the **Customer Education and Protection Department (CEPD), RBI, Central Office.**

For the benefit of the customers, the details of various contact points for grievance redressal mechanism shall be made available on the website of the Company.

5. Monitoring

All new and pending Customer complaints along with ageing analysis and complaints received from the Reserve Bank of India shall be placed before the Board of Directors of the Company on a quarterly basis for the review by the Board.

6. Resolution of Complaints

The department heads are responsible jointly and severally for resolution provided by their teams and for closure of customer issues.

7. Review:

A review of compliance with this Policy and the functioning of the Grievance Redressal Mechanism would be done by the Management regularly. The Board shall review the policy annually and otherwise as it deems appropriate. An updated copy of this code shall be made available on the website of the Company.

RESERVE BANK – INTEGRATED OMBUDSMAN SCHEME 2021

SALIENT FEATURES:

As per RBI Notification No. CEPD. PRD. No. S873/13.01.001/2021-22 dated November 12, 2021, the Integrated Ombudsman Scheme, 2021 (the Ombudsman Scheme, 2021) is effective from November 12, 2021. The Ombudsman Scheme, 2021 has adopted 'One Nation One Ombudsman' approach by making the RBI Ombudsman mechanism jurisdiction neutral. The Ombudsman Scheme, 2021 has integrated then existing following three RBI Ombudsman Schemes.

- (i) the Banking Ombudsman Scheme, 2006;
- (ii) the Ombudsman Scheme for Non-Banking Financial Companies, 2018;
- and

- (iii) (iii) the Ombudsman Scheme for Digital Transactions, 2019.

APPLICABILITY:

The Ombudsman Scheme, 2021 covers the following regulated entities (RE):

- (i) all Commercial Banks, Regional Rural Banks, Scheduled Primary (Urban) Cooperative Banks and Non-Scheduled Primary (Urban) Co-operative Banks with deposits size of Rupees 50 crore and above as on the date of the audited balance sheet of the previous financial year;
- (ii) all Non-Banking Financial Companies (NBFC) (excluding Housing Finance Companies) which (a) are authorized to accept deposits; or (b) have customer interface, with an assets size of Rupees 100 crore and above as on the date of the audited balance sheet of the previous financial year; and
- (iii) all System Participants as defined under the Scheme.

PROCEDURE FOR GRIEVANCE REDRESSAL UNDER THE OMBUDSMAN SCHEME 2021:

1. Grounds of complaint:

Any act/omission of Regulated Entity resulting in deficiency in service may file complaint personally or through an authorized representative.

“Authorized Representative” means a person, other than an advocate (unless the advocate is the aggrieved person) duly appointed and authorized in writing to represent the complainant in the proceedings before the Ombudsman.

2. Complaint shall not lie under the Ombudsman Scheme, 2021 unless:

- a. The complainant had, before making a complaint under the Scheme, made a written complaint to the Regulated Entity concerned and
 - b. the complaint was rejected wholly or partly by the Regulated Entity, and the complainant is not satisfied with the reply; or the complainant had not received any reply within 30 days after the Regulated Entity received the complaint; and
 - c. the complaint is made to the Ombudsman within one year after the complainant has received the reply from the Regulated Entity to the complaint or, where no reply is received, within one year and 30 days from the date of the complaint.
 - d. The complaint is not in respect of the same cause of action which is already:
 - i. pending before an Ombudsman or settled or dealt with on merits, by an Ombudsman, whether or not received from the same complainant or along with one or more complainants, or one or more of the parties concerned;
 - ii. pending before any Court, Tribunal or Arbitrator or any other Forum or Authority; or, settled or dealt with on, merits, by any Court, Tribunal or Arbitrator or any other Forum or Authority, whether or not received from the same complainant or along with one or more of the complainants/parties concerned.
 - e. The complaint is not abusive or frivolous or vexatious in nature;
 - f. The complaint to the Regulated Entity was made before the expiry of the period of limitation prescribed under the Limitation Act, 1963, for such claims;
- II. The complainant provides complete information as specified in clause 11 of the Scheme;

III. The complaint is lodged by the complainant personally or through an authorized representative other than an advocate unless the advocate is the aggrieved person.

3. Grounds for non-maintainability of a Complaint under the Ombudsman Scheme, 2021 are those involving matters such as

- a. Commercial judgment/commercial decision of a RE;
- b. Dispute between a vendor and a RE relating to an outsourcing contract;
- c. Grievance not addressed to the Ombudsman directly;
- d. General grievances against Management or Executives of a RE;
- e. Dispute in which action is initiated in compliance with the orders of a statutory or law enforcing authority;
- f. Service not within the regulatory purview of RBI;
- g. Dispute between RE's; and
- h. Dispute involving the employee-employer relationship of a RE.

4. Process for filing Complaint:

Written Complaint to NBFC

At the end of 30 Days

If the complaint is rejected wholly or partly by the NBFC and customer remain dissatisfied with response OR No reply is received from the NBFC and if customer has not approached any other forum

To file Complaint with the Ombudsman

(Within one year of reply received from NBFC; or one year and 30 days if no reply received from NBFC)

- A) CMS Portal (<https://cms.rbi.org.in>); OR
B) Electronic or Physical mode to Centralized Receipt & Processing Centre (CRPC) (As per attached format) E-mail: CRPC@rbi.org.in Address: Centralized Receipt & Processing Centre (CRPC),

Centralized Receipt and Processing Centre (CRPC),

Reserve Bank of India, Central Vista,

Sector 17, Chandigarh - 160 017

5. Appeal before Appellate Authority:

The complainant aggrieved by an Award or rejection of a complaint by Ombudsman Office, may, within 30 days of date of receipt of award or rejection of complaint, prefer an appeal to Executive Director, Consumer Education & Protection Department (CEPD), RBI.

The Appellate Authority may, if it is satisfied that the complainant had sufficient cause for not making the appeal within the time, may allow a further period not exceeding 30 days.

6. Resolution of Complaints:

Proceedings before Ombudsman are summary in nature.

Promotes settlement through facilitation, conciliation or mediation. If not reached, can issue Award/Order

Note:

- This is an Alternate Dispute Resolution mechanism.
- Complainant is at liberty to approach Court, Tribunal or Arbitrator or any other forum or authority.

Please refer https://rbidocs.rbi.org.in/rdocs/content/pdfs/RBIOS2021_121121.pdf for detailed copy of scheme

Details of the Principal Nodal Officer of the Company

Mr. Nidheesh P C
Managing Director
Valuvanadu Capital Ltd
BUILDING NO:8/37, CH BYPASS ROAD
KARUVAMBRAM(PO), MANJERI, MALAPPURAM DIST
KERALA, PIN-676123
Mob: 7356477762
Email: md@valuvanaducapital.com