



## **ADITYA BIRLA CAPITAL DIGITAL LIMITED**

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### **CUSTOMER PROTECTION AND GRIEVANCE REDRESSAL POLICY**

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## I. INTRODUCTION

Aditya Birla Capital Digital Limited (the “Company” or “ABCDL”) is a company incorporated in the year 2023 under the Companies Act, 2013 with its registered office in Mumbai. ABCDL has applied to the Reserve Bank of India (RBI) seeking authorization to set up and operate a payment system for issuance and operation of Prepaid Payment Instruments (“PPI”) under the RBI’s Master Directions on PPIs (“PPI Master Directions”).

PPI Master Directions mandates a PPI issuer to put in place a board approved Customer Protection and Grievance Redressal Policy and publicly disclose it. PPI Master Directions also stipulates a PPI issuer to designate a Nodal Officer to handle customer complaints/ grievances.

ABCDL has framed this Customer Protection and Grievance Redressal Policy (the “Policy”) with the approval of its Board of Directors and designated a Nodal Officer to ensure adherence to the Policy in accordance with the following regulations:

- PPI Master Directions;
- Harmonisation of Turn Around Time (TAT) and customer compensation for failed transactions using authorised Payment Systems;
- Integrated Ombudsman Scheme, 2021; and
- Online Dispute Resolution (ODR) System for Digital Payments dated August 6, 2020.

## II. DEFINITIONS

- ❖ **“Customer”** means the individual or an entity who is the end user of the PPI products and services offered by ABCDL;
- ❖ **“Complaint or Grievance”** refers to any correspondence that is comprehensive and unambiguous in its manner and that expresses dissatisfaction with unsatisfactory service, inappropriate behaviour, or any act of omission or commission. Communications meant to provide suggestions, feedbacks, queries or clarifications, however, won't be considered as instances of complaints or grievances.
- ❖ **“Products”** refers to the PPI products issued/ offered by ABCDL;
- ❖ **“Unauthorized transaction”** are transactions where the amount is debited to the Customer’s account without Customer’s consent.

### **III. OBJECTIVES OF THE POLICY**

ABCDL places paramount importance on customer service and satisfaction. The Company believes that providing prompt and efficient service is essential, not only to attract new Customers, but also to retain existing ones.

Following are the broad objectives of the Policy:

- ❖ To ensure compliance with all the applicable regulations through the adoption of best practices while meeting business objectives;
- ❖ To formulate and implement a grievance redressal framework for all the Products offered by the Company;
- ❖ To treat Customers in a fair and reasonable manner;
- ❖ To provide various channels to raise any complaint/ grievance;
- ❖ To ensure Customer satisfaction and protection towards any frauds or misconducts;
- ❖ To ensure that all Complaints are addressed according to the defined Turn-Around-Time (TAT) and Escalation matrix to the User's satisfaction; and
- ❖ To ensure all the grievance/complaints raised are resolved in a seamless, efficient and effective manner.

### **IV. GRIEVANCE REDRESSAL MECHANISM**

To fulfill the above objectives, ABCDL has developed a robust grievance redressal mechanism designed to resolve/ address Customer complaints in a fair, efficient and timely manner.

#### **Modes for complaint registration**

Following modes will be made available to the Customers to raise complaints/ grievances with the Company:

- ❖ Customer care no.
- ❖ Online Form (Mobile app/ website)
- ❖ Email support
- ❖ CHATBOT
- ❖ Letter (via courier)

#### **Customer information**

While raising complaint, the Customer must provide the following information:

- ❖ Customer's name (in entirety)
- ❖ Customer Registration Number
- ❖ Customer's correspondence address
- ❖ Mobile Number
- ❖ Email id
- ❖ Details of the complaint

Once the complaint is registered, Customer will receive an intimation with a reference number within 24 hours, through which the Customer will be able to track the progress of the complaint.

ABCDL will ensure the following:

- ❖ **An acknowledgement** is sent to the Customer within 24 hours of the receipt of the complaint.
- ❖ **Tracking facility** is made available to the Customer to check the status of the resolution by using the allotted Unique Ticket Number on any of the aforementioned modes.
- ❖ **Escalation mechanism** is put in place.
- ❖ **Disposal of Complaints** will be done **expeditiously** within time limit as given escalation matrix and in no case shall exceed a period of 30 business days of its receipt.
- ❖ **Reasons in writing** are provided for resolution or rejection of the complaint.

### Escalation Matrix

Tabulated below is the proposed escalation matrix, available modes for redressal and estimated TAT for resolution. The Customer may escalate the issue further, if he/she is not satisfied by the responses provided or has unresolved complaints at any level.

Level	Responsible Personnel	Officer Contact details	Redressal timeframe (Turn-around-times)
<b>Level 1</b>	Customer Service Associate/ Authorised Agent	<ul style="list-style-type: none"> <li>• Phone Number</li> <li>• Email Address</li> <li>• Online Form</li> </ul>	Within <b>3 business days</b> from the date of receipt of complaint
<b>Level 2</b>	Customer Relations Officer	<ul style="list-style-type: none"> <li>• Phone Number</li> <li>• Email Address</li> </ul>	Within <b>5 business days</b> from the date of receipt of complaint

<b>Level 3</b>	Nodal Officer	<ul style="list-style-type: none"> <li>• Phone Number</li> <li>• Email Address</li> <li>• Address</li> </ul>	Within <b>5 business days</b> from the date of receipt of complaint to the Nodal Officer
<b>Level 4</b>	Integrated Ombudsman	<ul style="list-style-type: none"> <li>• Phone Number</li> <li>• Email Address</li> <li>• Address</li> </ul>	-

### Turn-Around-Time for grievance redressal

Encapsulated below is the indicative Turn-Around-Time (“TAT”) to dispose-off Customer complaints/ grievances:

Type of complaint	Proposed TAT for resolution*
Registration / Onboarding	3 Business Day
PPI load/ reload	3 Business Day
KYC upgrade	7 Business Day
Payment to Merchants, Billers, for financial products, etc.	7 Business Day
Card related (activation, delivery, etc.)	7 Business Days
Refund / return issues	5 Business Days
Wallet to Wallet transactions	7 Business Days
Wallet to Bank transactions	7 Business Days
Others	7 Business Days

\*In certain types of transactions, wherein ABCDL may have a third-party dependency for final resolution, the TAT may be higher, but all complaints will be endeavoured to be resolved within 30 days of being raised with the Company.

### Details of the Nodal Officer

The contact details of the Nodal Officer are as under for Customers to escalate their complaints:

- ❖ Name: Sujatha Aroon
- ❖ Address: 9<sup>th</sup> Floor, One World Center, Tower 1, Jupiter Mills Compound, 841 Senapati Bapat Marg, Elphinstone Road, Delisle Road, Mumbai, Mumbai, Maharashtra, India, 400013

- ❖ Email Id: abcdl.Servicehead@adityabirlacapital.com
- ❖ Phone no: 022-68323410

#### The RBI Ombudsman

Under the Reserve Bank – Integrated Ombudsman Scheme, 2021, a Customer can further escalate their complaints to RBI ombudsman, in case Customer is not satisfied by the resolution provided by the Company or if the Customer’s grievance remains unresolved even after 30 days of first registering it with the Company. Such Customer can lodge their grievance on the ‘Complaint Management System’ (CMS) portal of the RBI. The Customer must only approach the RBI Ombudsman after their Grievance has been addressed by the Nodal Officer of the Company at Level 3 of the matrix.

#### **Reporting of unauthorised transactions and liability of the Customer**

To ensure safe and secure transaction and to mitigate the frauds taking place, the RBI vide its Notification titled ‘Customer Protection – Limiting Liability of Customers in Unauthorised Electronic Payment Transactions in Prepaid Payment Instruments (PPIs) issued by Authorised Non-banks’ dated January 4, 2019 issued guidelines outlining the liability of Customers in cases of unauthorized transactions.

In accordance with the said Guidelines, ABCDL will also provide its Customers with 24X7 reporting facility which will include website/ SMS/ e-mail/ a dedicated toll-free helpline for reporting unauthorised transactions that have taken place and/ or loss or theft of the PPI.

The following table represents a Customer’s liability basis the nature of unauthorised transaction and the time taken by the Customer to report such transactions:

<b>Sr. No.</b>	<b>Particulars</b>	<b>Maximum Liability of Customer</b>
<b>(a)</b>	Contributory fraud / negligence / deficiency on the part of ABCDL (irrespective of whether or not the transaction is reported by the Customer)	Zero
<b>(b)</b>	Third party breach where the deficiency lies neither with ABCDL nor with the Customer but lies elsewhere in the system, and the Customer notifies ABCDL regarding the unauthorised payment transaction.	

	The per transaction Customer liability in such cases will depend on the number of days lapsed between the receipt of transaction communication by the Customer from ABCDL and the reporting of unauthorised transaction by the Customer to ABCDL -	
	i. Within three days*	Zero
	ii. Within four to seven days*	Transaction value or INR 10,000/- per transaction, whichever is lower
	iii. Beyond seven days*	100%
(c)	In cases where the loss is due to negligence by a Customer, such as where they have shared the \OTP, Card no, CVV, etc, or any other form of payment credentials the Customer will bear the entire loss until they report the unauthorised transaction to ABCDL. Any loss occurring after the reporting of the unauthorised transaction shall be borne by ABCDL.	
(d)	The Nodal Officer may also, at their discretion, decide to waive off any Customer liability in case of unauthorised electronic payment transactions even in cases of Customer negligence.	
<i>* The number of days mentioned above will be counted excluding the date of receiving the communication from ABCDL.</i>		

Further, once the Customer intimates of any such unauthorised electronic payment transaction, ABCDL will credit (notional reversal/ shadow reversal) the amount involved in the unauthorised electronic payment transaction to the Customer's PPI within 10 days (without waiting for settlement of insurance claim, if any), even if such reversal breaches the maximum permissible limit applicable to that type/ category of PPI.

The burden of proving Customer liability in case of unauthorised electronic payment transactions will lie on ABCDL.

Further, as mandated by the PPI Master Directions, ABCDL will resolve the grievance/complaint within 90 days of receipt of such complaint and also establish the liability of the Customer, if any. In case ABCDL is not able to either resolve the grievance



or establish any Customer liability within 90 days of receipt of the Complaint, then ABCDL will compensate the Customer in accordance with the liability clause tabulated above. 9

### **Customer Compensation and TAT for failed transactions**

ABCDL will define Customer compensation and TAT process for failed transactions for its PPI products. This process is in accordance with RBI's "Harmonisation of Turn Around Time (TAT) and Customer compensation for failed transactions using authorised Payment Systems, 2019". The following table details the said process:

(Note: Here, T refers to the calendar date of transaction; R refers to the day on which the reversal is concluded.)

<b>Sr. No.</b>	<b>Description</b>	<b>Timeline for auto-reversal</b>	<b>Compensation payable</b>
<b>1.</b>	Beneficiary's PPI not credited.  PPI debited but transaction confirmation not received at merchant location.	Reversal affected in Remitter's account within T+1 days.	INR 100/- per day if delay is beyond T+1 days.

## **V. MAINTAINANCE OF RECORDS**

ABCDL will preserve and maintain the following records pertaining to grievances received by them, as required under the applicable regulations:

- ❖ Nature of grievances/ complaints received;
- ❖ Communication with the customer;
- ❖ Action taken;
- ❖ Current status;
- ❖ Resolution provided; and
- ❖ Compensation awarded, if any