



ADITYA BIRLA CAPITAL DIGITAL LIMITED

CUSTOMER PROTECTION AND GRIEVANCE REDRESSAL POLICY

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I. DEFINITIONS

- ❖ **“Customer”** means an individual or an entity who is the end user of the payment solutions 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.
- ❖ **“Complainant”** refers to any Merchant or Customer availing the services of the Company directly or indirectly and raising the complaint due to dissatisfaction.
- ❖ **“Merchant”** refers to an individual or legal entity with whom the Company has entered into a contract for the purpose of providing payment solutions.
- ❖ **“Nodal Officer”** means a designated employee of the Company responsible for overseeing the grievance redressal process.

II. OBJECTIVES OF THE POLICY

ABCDL places paramount importance on Customer service and satisfaction to acquire, retain and nurture an enduring relationship with the end users. The Company believes that providing prompt and efficient service is essential in the service industry.

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 increase transparency, so that the Users can have better understanding of what they can reasonably expect of the services;
- ❖ To formulate and implement a grievance redressal framework for all the Products offered by the Company;
- ❖ To treat Users 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.

III. **GRIEVANCE REDRESSAL MECHANISM**

In order to deliver a high level of enriched Customer experience and to fulfill the above objectives, ABCDL has developed a robust grievance redressal mechanism designed to resolve/ address Users complaints in a fair, efficient and timely manner.

Modes for complaint registration

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

- ❖ Customer care no.
- ❖ Raise a request via App/Web App
- ❖ Email support
- ❖ CHATBOT

Users information

While raising complaint, the Users must provide the following information (as may be applicable):

- ❖ Users name (in entirety)
- ❖ Users Registration Number
- ❖ Users correspondence address
- ❖ Mobile Number
- ❖ Email id
- ❖ Details of the complaint:
 - Date of transaction
 - Amount of transaction
 - Transaction ID
 - Description of the problem
 - Details of email communication (screenshot) about the problem with the Company (in case of merchant) or merchant (in case of Customer).

Once the complaint is registered, Users will receive an intimation with a reference number for tracking the progress of the complaint.

ABCDL will ensure the following:

- ❖ **An acknowledgement** will be sent to the Users within 24 hours of the receipt of the complaint.
- ❖ **Escalation mechanism** will be put in place.

❖ **Disposal of Complaints** will be done expeditiously within time limit as given escalation matrix and in no case will exceed a period of 30 business days of its receipt.

❖ **Reasons in writing** will be 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 Users 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)
Level 1	Customer Service Associate/ Authorised Agent	<ul style="list-style-type: none"> Phone Number Email Address Online Form 	Within 3 business days from the date of receipt of complaint
Level 2	Customer Relations Officer	<ul style="list-style-type: none"> Phone Number Email Address 	Within 5 business days from the date of receipt of complaint
Level 3	Nodal Officer	<ul style="list-style-type: none"> Phone Number Email Address Address 	Within 5 business days from the date of receipt of complaint to the Nodal Officer
Level 4	Integrated Ombudsman	<ul style="list-style-type: none"> Phone Number Email Address Address 	-

Turn-Around-Time for grievance redressal

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

Type of complaint	Proposed TAT for resolution*
Registration / Onboarding	3 Business Days
Registration	3 Business Days
KYC upgrade	7 Business Day
Payment to Merchants, Billers, for financial products, etc.	7 Business Days

Card related (activation, delivery, etc.)	7 Business Days
Refund / return issues	5 Business Days
Failed transactions	7 Business Days
Wallet to Wallet transactions	7 Business Days
Wallet to Bank transactions	7 Business Days
Others	7 Business Days

* The TAT mentioned above may differ on case-to-case basis.

*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 endeavored to be resolved within 30 days of being raised with the Company.

#Any chargeback leading to dispute/ arbitration will be resolved as per the TATs prescribed by respective Card Network.

Details of the Nodal Officer

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

- ❖ Name: Ms. Sujatha Aroon
- ❖ Address: 7th Floor, One World Centre, Tower 1, Jupiter Mills Compound, 841 Senapati Bapat Marg, Elphinstone Road, Delisle Road, Mumbai – 400013
- ❖ Email Id: abcdl.Servicehead@adityabirlacapital.com
- ❖ Phone no: 022-65022749

The RBI Ombudsman

Under the Reserve Bank – Integrated Ombudsman Scheme, 2021, Users can further escalate their complaints to RBI ombudsman, in case the User is not satisfied by the resolution provided by the Company or if the Users grievance remains unresolved even after 30 days of first registering it with the Company. Such Users can lodge their grievance on the ‘Complaint Management System’ (CMS) portal of the RBI. The Users 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. The contact details and procedure for approaching the Ombudsman under Integrated Ombudsman Scheme, 2021 can be referred to here: <https://cms.rbi.org.in/>.

Complaints with respect to cancellation of Order/Returns/Refunds/Fraudulent Activity

- ❖ Any complaint relating to the full or partial cancellation of orders are routed to the merchant.
- ❖ A refund will be initiated only after undertaking reconciliation.
- ❖ In case the order is not generated at the time of the transaction, the Customer gets the credit in their bank account within 5-7 business days failing which they can contact the Company for refund-related queries.
- ❖ ABCDL will ensure that the refund of the concerned transaction, whether it's a case of fraud, order cancellation, returns, etc., will always be credited back to the transaction originating bank account, card or UPI account, by triggering the refund of the concerned order ID.
- ❖ ABCDL will seek for valid reasons and proper documentation, where the Customer is asking for the refunds in some other account other than the transaction originating account. This request is considered only in exceptional circumstances, post doing proper due diligence of the scenario or in case of any directions from the Law Enforcement Agencies or banking authorities.

IV. COMPLAINT REVIEW MECHANISM

ABCDL will periodically review the complaints received and analyse the same on the basis of the following parameters:

- ❖ Number of Escalations;
- ❖ TAT Adherence;
- ❖ Frequency of a particular nature of complaint;
- ❖ Complaints escalated to the Integrated Ombudsman; and
- ❖ Any shortcoming in complaint management

Considering above, the Company will make necessary changes to the Grievance Redressal Mechanism and the same will be updated in the policy. This review will also ensure that the complaints of similar nature are not repeated.

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 Users;

- ❖ Action taken;
- ❖ Current status;
- ❖ Resolution provided; and
- ❖ Compensation awarded, if any

ABCDL will preserve the above mentioned documents for at least 10 years.