

MAHAN INDUSTRIES LIMITED

**Customer Service and Grievance Handling -
Standard Operating Procedure (SOP)**

1. Background:

Customer Service is a key focus area of Mahan Industries Limited. Customer Service for us is a holistic approach targeting consistent improvement in customer experience and quality of operations. We strongly believe that a satisfied customer is the most important factor in developing our business. The Customer Grievance Redressal Policy outlines the framework for addressing the customer grievances. This SOP requires to be approved by the Board of Directors as per the requirement under Appointment of Internal Ombudsman by Non-Banking Financial Companies.

We shall ensure that the policy is made available in public domain (website and branches).

2. The objective of the policy is to ensure that:

- All customers are always treated fairly and without bias
- All issues raised by customers are dealt with courtesy and resolved on time
- Customers are made completely aware of their rights so that they can opt for alternative remedies if they are not fully satisfied with our response or resolution to their complaint

This policy is applicable to all customers of Mahan Industries Limited and all the matters brought to the notice of Mahan Industries Limited through its recognised correspondence and interaction channels. This excludes the cases which are sub-judice.

3. Overview of Customer Service

Customer interactions are categorized as under:

- i. **Queries (Q)** - Customer requirements which can be attended to and closed immediately, without requirement of further processing.
 - ii. **Requests (R)** - Customer requirements which need further processing and are not in the nature of complaint.
 - iii. **Complaints (C)** –. Complaints should be raised in the following scenarios.
 - a. Non-closure of request within promised timeframe (TAT).
 - b. Deficiency in Promised action and services provided to the customers in writing
 - c. Breach of agreed terms and conditions of the loan contract
 - d. Wrong commitment and non-disclosure of material terms as defined in the Fair Practices Code.
 - e. Action and behavior of the company employee and partner resulting in dissatisfaction / financial loss / and where customers have cited facts of incident.
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All interactions with customers are recorded in the Customer Relationship Management (CRM) system as one of the above types (Q/R/C). The tagging is done based on the Business Process the interaction relates to and detailed scenarios of the customers' queries. A typical Query/Request/Complaint tagging is like:

Business Process	Attribute	Sub Attribute
Deliverables	Interest Certificate	Request for Final Interest Certificate

Cases tagged as "Requests" and "Complaints" are assigned to a specific user/ user group whose responsibility it is to resolve the same.

Each Attributes Sub-Attributes (Scenarios) has a predefined TAT by which it needs to be resolved. An escalation matrix is defined in the CRM when Queries/Requests/Complaints are not closed within the stipulated TAT.

4. Aspects of grievance redressal policy:

- **Registration:** We enable customers to avail of our services through multiple channels. The various channels available to customers are as follows:
- **Customer care:** Customers can contact our Customer Care over the phone for redressal of issues or send an e-mail/letter to the mail ids/addresses displayed on our website and branches.
- **Registered office:** A customer can walk into our Registered office and be attended by our service executives. The customer would need to fill-up a Customer Request Form (CRF). An acknowledgement is given to the customer for the service requested. In the CRF, the Case ID generated from the CRM system is also mentioned for future reference.
- **Website:** Customers can contact us by our website for various requirements, as well as to raise service requests, which get updated into the CRM system for resolution.
- **Acknowledgement:** Acknowledgement shall be given to all the customers with the expected Turn Around Time.

5. Escalation Matrix for Customer:

If any customer is not satisfied with the resolution received as per above mentioned process, customer has been given the opportunity to escalate as per our grievance matrix on our website. The details of grievance Redressal officers with escalation matrix is given below:

Level	Channel	Addressed to Internally
Level 1	Customer Care Team	6355895061
Level 2	Grievance Redressal Officer	Mr. Nishil Shah, Director md@mahan.co.in
Level 3	Principal Nodal Officer	Mr. Niranjan Jain, CFO & Director CFO@Mahan.co.in
Level 4	RBI Complaint Management System as per the RBI Integrated Ombudsman scheme	https://cms.rbi.org.in/

The Grievance Handling mechanism shall be governed as per the Reserve Bank – Integrated Ombudsman Scheme, 2021 read in conjunction with RBI/CEPD/2023-24/108 CEPD.PRD.No.S1228/13.01.019/2023-24 . The Grievance handling will also take into account the relevant guidelines under the Fair Practices Code prescribed by RBI.

Role of Principal Nodal Officer (Chief Grievance Redressal Officer)

In accordance with RBI guidelines on Reserve Bank - Integrated Ombudsman Scheme, 2021, the company has a Principal Nodal Officer (Chief Grievance Redressal Officer – CGRO) whose role is primarily, as under:

1. To receive communications (primarily containing grievances) from customers (who use the escalation matrix), from various offices of RBI and to oversee resolution thereof by the Central Customer Service team.
2. To independently review the handling of QRCs received – based on summarized reports provided by the Central Customer Service team and to provide feedback, thereon.
3. To recommend changes in process/documentation/customer responses etc. for improvement of the QRC handling mechanism.
4. To periodically present a report on the QRC handling mechanism to the Board/Committee of the Board.
5. For each region, regional Nodal Officers have been identified for interacting with the respective Ombudsman Offices. The details of the same are updated on our website and displayed at our branches.

6. Grievance Redressal for Digital Lending:

- The Principal Nodal Officer as per the escalation mechanism as mentioned above shall also deal with the FinTech / digital lending and other company partners related complaints/ issues raised by the borrowers. This includes the complaints raised against the Digital Lending Applications (mobile and web-based applications with user interface that facilitate borrowing by a borrower including the Company’s apps as well as those operated by lending service providers engaged by the Company for extension of any credit facilitation services).

- Contact details of grievance redressal officers shall be prominently displayed on the websites of TCL, its Lending Service Providers (LSPs) and on Digital Lending Apps (DLAs) and also in the Key Fact Sheet (KFS) provided to the borrower.
- The facility of lodging complaint shall also be made available on the DLA and on the website of LSP
- The responsibility of grievance redressal shall continue to remain with TCL.
- If any complaint lodged by the borrower against TCL or the LSP engaged by TCL is not resolved by TCL within 30 days, the borrower can lodge a complaint over the Complaint Management System (CMS) portal of RBI.
- Periodic review and monitoring of grievances received through digital / fintech partners would be done.

7. Privacy and Confidentiality of information-

All service calls (Inbound and Outbound other than welcome calling) with respect to their loan account shall be done post verification by TCL employees or its agents or associates. Such verification shall be done with combination of any 2 or more of the below parameters. Employee or agent interacting with the customer is required to probe information to ensure authenticity of the person or caller and avoid revealing information to anyone other than customers.

- DOB,
- ADDRESS
- PAN
- SANCTION AMT
- EMI AMT

8. Standard Operating Procedure (SOP) for Grievance Handling is as given below:

Sr. No.	Particulars	Maximum TAT (Working days)
1	Customer approaches for servicing.	T
2	Based on the customer requirement or concerns the case is tagged as QRC.	T+2 days
3	If SR type is Query, Same will get auto closed after resolving the	T+2 days
4	If SR type is Request/Complaint, Same will get auto assigned to the	T+2 days
5	Request SR Case will be attended by the respective teams and SR is closed	As per the case individual TAT

6	Closure communication triggered to the customer's registered email id	Real time on SR closure
7	Complaint SR case is attended by the specialised central Grievance	As per the case individual TAT
8	For partial acceptance / rejection decision by the Grievance team, mandatory comment and reasons for partial acceptance / rejection and upload of (pop up) evidence and documents	T+20. immediately after the Case processing by the Central Grievance Redressal Team (Maximum T+20)
9	Auto assigned to Internal Ombudsman ("IO") queue in CRM for further review and decision if the complaint is processed with partial acceptance/full rejection of the customer's	T+20. Immediately after the Case processing by the Central Grievance Redressal Team (Maximum T+20)
10	Auto Communication triggered to the customers' registered Email id / Mobile number informing the status of the complaint (initial decision) and that same is being reviewed by IO	T+20. Immediately after the Case processing by the Central Grievance Redressal Team (Maximum T+20)
11	The IO will review all such complaints assigned to its queue and can either uphold (accept) or reject the resolution. For such	T+25 days
12	In case the IO upholds the decision of the Internal grievance mechanism to reject/partly reject the complaint, the auto communication is triggered to the customer stating the fact that the complaint has been examined by the IO and, for the reasons stated in the reply, the decision of the Internal grievance	T+25 days
13	If IO recommends a different resolution, the SR will get auto assigned	T+25 days
14	PNO will go through the recommendation of IO and may either accept	T+25
15	If PNO agrees and accepts the recommendation of IO, same will be actioned accordingly and communicated to customer	T+27 days
16	If PNO disagrees with the recommendation of IO, the SR will get further auto assigned to MD's queue for final decision /	T+27 days
17	MD will review all such complaints and may either accept IO's	T+30days
18	If MD approves the original decision, the case will get closed with final decision and communication to the customer. In such cases, the reply to the complainant shall explicitly state the fact that the complaint was examined by the IO and the decision of the NBFC was overruled by the IO in favour of the complainant; however, the NBFC, with the approval of the Managing Director, has disagreed with the decision of the IO. The communication will also mention that the customer can further approach RBI for redressal and the RBI CMS portal link will be mentioned in the same.	T+30 days

19	If the MD agrees with the IO's recommendation, the case will be auto assigned to PNO for implementing the recommendation and further final communication to the customer.	T+30 days
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9. Training to Staff

Based on the analysis of complaints handled by Internal Ombudsman, training to staff would be provided to raise awareness among the frontline staff about, the pattern of complaints being received, their root causes, remedial measures and expected action on the part of frontline staff.

10. Reports & Review

I. Reporting To Managing Director:
 In-depth periodic reports on the status of QRC are reviewed by the PNO and the respective Functional Heads. Summarized reports are a part of each business review put up to the Managing Director

An indicative list of such reports is given below –

Nature of Reports
Summary of cases
Trend of Queries, Requests and Complaints
Top (N) Customer Complaints & Requests
Ageing of Open Customer Requests and Complaints

II. Reporting to the Board/ Committee of Board and RBI Quarterly report to Board/Committee of Board including –

<ul style="list-style-type: none"> • No. of IO decisions overruled by MD • Analysis of pattern of complaints on a quarterly basis by the IO Quarterly report to RBI – total no. of Complaints received, the number of partly or wholly rejected complaints, resolution type, Escalation to IO, IO decision, MD decision - within 10 days of the quarter
Yearly report to RBI in the format and timelines prescribed by RBI from time to time-

11. Customer Feedback Mechanism

Customers may submit feedback, suggestions, or complaints through our designated email, phone number, or registered office, and the same shall be acknowledged and addressed in a time-bound manner as per our Grievance Redressal Policy.
