ELECTRONICA FINANCE LIMITED

Grievance Redressal Policy

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PREFACE:

Electronica Finance Limited [the "**Company**"], is a Non- Banking Financial Company. In terms of the RBI Master Direction – Non Banking Financial Company–Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016 ("Directions"), every Non-Banking Financial Company (NBFCs-ND-SI) ("NBFCs-ND-SI") ["**RBI**"] under section 45-IA of the Reserve Bank of India Act, 1934 ["**RBI Act**"].

It is essential that grievances of the customers are given due consideration and quick action is taken to resolve the same. To provide efficient and enhanced services to the customers and resolution of their grievances, the Company Company has adopted this Grievance Redressal Policy providing for an effective Grievance Redressal Mechanism.

OBJECTIVE:

The Company is committed to ensure transparency and fair dealings. The Company and all its employees as well as service providers (where applicable) are bound by the commitments provided as under:

- Offering efficient channels to route the queries
- 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.

GRIEVANCE REDRESSAL OFFICER:

The Board of Directors of the Company have appointed a Grievance Redressal Officer (GRO), who shall be responsible for overall functioning of the Grievance Redressal Mechanism of the Company. The Grievance Redressal Officer shall also be responsible to address grievances escalated to him / her and for ensuring prompt and efficient functioning of grievances redressal mechanism.

GRIEVANCE REDRESSAL MECHANISM:

Any customer having a grievance / complaint / feedback with respect to the product and service offered by EFL may write to the Company' Customer Service Department in the following manner:

I. Filing a Complaint:

- a. Branch Customers with a grievance can visit the branch office and provide a written complaint;
- b. Email : Customers can send their grievance through email at : <u>customerfirst@efl.co.in</u>
- c. Letters: Customer can write to: Customer Service, Electronica Finance Limited, Audumbar, 101/1, Erandwane, Dr Ketkar Road, Pune 411004, Maharashtra
- For proper resolution, Customer is requested to mention the Loan application number or Loan Account number while filing the complaint.
- Anonymous complaints will not be addressed.

II. Resolution Process:

- On receipt of complaint, the Company shall, within reasonable time, send an acknowledgement of the same to the complainant. All the complaints received shall be recorded.
- The Customer Service Officer shall ensure that all complaints are resolved in a timely and effective manners, and status of resolution / closure of complaints in records is updated.
- The Customer Service Officer shall monitor the complaints status to ensure that the complaints are resolved within 30 days of receipt of complaint.
- If in any case, the Company needs additional time, the Company will inform the customer the reasons of delay in resolution within the timelines specified above and provide expected time lines for resolution of the complaint.

III. Escalation Matrix

If a customer is not satisfied with the resolution provided by the Company in the specified period above, the customer can escalate the issue to:

Grievance Redressal Officer

Mr. Vallabh Ghate Electronica Finance Limited Audumbar, 101/1, Erandwane, Dr Ketkar Road, Pune 411004, Maharashtra Phone No: 020-67290700 Email id: grievance@efl.co.in

Principal Nodal Officer

Mr. Amit Gadre Electronica Finance Limited Audumbar, 101/1, Erandwane, Dr Ketkar Road, Pune 411004, Maharashtra Phone No: 020-67290700 Email id: nodalofficer@efl.co.in

In case a grievance / complaint is not resolved within a period of 30 Days, the customer may further appeal to:

Department of Non-Banking Supervision, The Reserve Bank of India, Mumbai Regional Office, 3rd Floor, RBI Building, Opposite Mumbai Central Railway Station, Byculla, Mumbai – 400008 Telephone No.: 022 2308 4121 Fax No.: 022 2302 2011 Email: dnbsmro@rbi.org.in

DISPLAY OF INFORMATION:

The Company shall, at all places from where it conducts business prominently display the details of the Grievance Redressal Mechanism as well as the details of the Regional Office of the Reserve Bank

of India under whose jurisdiction the Company is registered. Relevant extract of Grievance Redressal Mechanism for display at branches is enclosed as Annexure-1.

OMBUDSMAN SCHEME:

The Company has adopted the Reserve Bank - Integrated Ombudsman Scheme, 2021 as notified by RBI on November 12, 2021.

If the customer does not receive any reply from EFL within one month of date of Complaint or is not satisfied with the response provided by EFL, he/she can file a complaint with the Ombudsman under the Reserve Bank - Integrated Ombudsman Scheme, 2021 ("**the scheme**"), not later than one year from date of receipt of response.

EFL has appointed Nodal Officer, who shall be responsible for representing EFL and furnishing information to the Ombudsman in respect of complaints filed against EFL.

EFL shall prominently display the Scheme, Salient features of the Scheme (Annexure 2) and details of the Principal Nodal Officer appointed by the Company and the Ombudsman to whom the complaints are to be made by the Customer (Annexure 3) at all branches from where it conducts business and also on the website of the Company.

MONITORING AND REVIEW:

The Grievance Redressal Officer shall ensure effective monitoring of the complaints and their resolution, and undertake necessary amendments to the Grievance Redressal Mechanism to make the process more efficient. The Company shall ensure periodic review of the Grievance Redressal Mechanism to ensure efficient and effective functioning of the same.

REVIEW OF GRIEVANCE REDRESSAL POLICY:

This Grievance Redressal Policy of the Company will be reviewed by the Board on recommendation of Grievance Redressal Officer on an annual basis for necessary changes required for enhancing the transparency and ethical standing of the organization and also to consider and adopt relevant regulatory amendments.

Grievance Redressal Mechanism of the Electronica Finance Limited

GRIEVANCE REDRESSAL MECHANISM:

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

- I. Filing of Complaints:
 - a. Branch Customers can visit the branch office and provide a written complaint;
 - b. Email : Customers can send their grievance through email at : <u>customerfirst@efl.co.in</u>
 - c. Letters: Customer can write to: Customer Service, Electronica Finance Limited, Audumbar, 101/1, Erandwane, Dr Ketkar Road, Pune 411004, Maharashtra
 - Customers shall ensure that they quote their application number or loan account number in every correspondence with the Company regarding their complaint.
 - Anonymous complaints will not be addressed.

II. Resolution Process:

- On receipt of complaint, the Company shall, within reasonable time, send an acknowledgement of the same to the complainant. All the complaints received shall be recorded.
- The Customer Service Officer shall ensure that all complaints are resolved in a timely and effective manners, and status of resolution / closure of complaints in records is updated.
- The Customer Service Officer shall monitor the complaints status to ensure that the complaints are resolved within 30 days of receipt of complaint.
- If in any case, the Company needs additional time, the Company will inform the customer the reasons of delay in resolution within the timelines specified above and provide expected time lines for resolution of the complaint.

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Principal Nodal Officer

Mr. Amit Gadre Electronica Finance Limited Audumbar, 101/1, Erandwane, Dr Ketkar Road, Pune 411004, Maharashtra Phone No: 020-67290700 Email id: nodalofficer@efl.co.in In case a grievance / complaint is not resolved within a period of 30 Days, the customer may further appeal to:

Department of Non-Banking Supervision, The Reserve Bank of India, Mumbai Regional Office, 3rd Floor, RBI Building, Opposite Mumbai Central Railway Station, Byculla, Mumbai – 400008. Telephone No.: 022 2308 4121 Fax No.: 022 2302 2011 Email: <u>dnbsmro@rbi.org.in</u>

THE RESERVE BANK – INTEGRATED OMBUDSMAN SCHEME, 2021 - SALIENT FEATURES

The Integrated Ombudsman Scheme, 2021 is effective from November 12, 2021. The Scheme adopts 'One Nation One Ombudsman' approach by making the RBI Ombudsman mechanism jurisdiction neutral. It integrates the existing three Ombudsman schemes of RBI namely, (i) the Banking Ombudsman Scheme, 2006; (ii) the Ombudsman Scheme for Non-Banking Financial Companies, 2018; and (iii) the Ombudsman Scheme for Digital Transactions, 2019.

APPLICABILITY: All entities regulated by Reserve Bank of India (i.e. Banks / NBFCs / Payment System Operators)

PROCEDURE FOR GRIEVANCE REDRESSAL UNDER THE SCHEME:

- I. <u>Grounds of complaint</u>: Any act/omission of Regulated Entity (RE) resulting in deficiency in service may file complaint personally or through an authorised representative. "Authorised Representative" means a person, other than an advocate (unless the advocate is the aggrieved person) duly appointed and authorised in writing to represent the complainant in the proceedings before the Ombudsman.
- II. Complaint shall not lie under the Scheme, unless:
 - a. The complainant had, before making a complaint under the Scheme, made a written complaint to the Regulated Entity concerned and
 - i. 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
 - ii. 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.
 - b. 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.
 - c. The complaint is not abusive or frivolous or vexatious in nature;
 - d. 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;

- e. The complainant provides complete information as specified in clause 11 of the Scheme;
- f. The complaint is lodged by the complainant personally or through an authorised representative other than an advocate unless the advocate is the aggrieved person.
- III. Grounds for non-maintainability of a Complaint under the scheme 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.

PROCESS FOR FILING COMPLAINT:



> 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.

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.
- $\circ\;$ 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.

Annexure-3

Details of the Nodal Officers ap	pointed by the Company
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Nodal Officer		Details of PNO / NO		
Principal Nodal Officer (PNO)	Name Location	:	Mr. Amit Gadre Registered Office	
	Address	:	Electronica Finance Limited Audumbar, 101/1, Erandwane, Dr Ketkar Road, Pune 411004, Maharashtra	
	Email	:	nodalofficer@efl.co.in	
	Phone	:	020-67290700	

SN	Centre	Address of the Office of NBFC	Area of Operation
		Ombudsman	
1.	Chennai	C/o Reserve Bank of India Fort Glacis, Chennai - 600 001 STD Code: 044 Telephone No : 25395964 Fax No : 25395488	Tamil Nadu, Andaman and Nicobar Islands, Karnataka, Andhra Pradesh, Telangana, Kerala, Union Territory of Lakshadweep and Union Territory of Puducherry
		Email : nbfcochennai@rbi.org.in	
2.	Mumbai	C/o Reserve Bank of India RBI Byculla Office Building Opp. Mumbai Central Railway Station Byculla, Mumbai-400 008	Maharashtra, Goa, Gujarat, Madhya Pradesh, Chhattisgarh, Union Territories of Dadra and Nagar Haveli, Daman and Diu
		STD Code: 022 Telephone No : 23028140 Fax No : 23022024 Email : nbfcomumbai@rbi.org.in	
3.	New Delhi	C/o Reserve Bank of India Sansad Marg New Delhi -110001 STD Code: 011 Telephone No: 23724856 Fax No : 23725218-19 Email : nbfconewdelhi@rbi.org.in	Delhi, Uttar Pradesh, Uttarakhand, Haryana, Punjab, Union Territory of Chandigarh Himachal Pradesh, and Rajasthan and State of Jammu and Kashmir
4.	Kolkata	C/o Reserve Bank of India 15, Netaji Subhash Road Kolkata-700 001 STD Code: 033 Telephone No : 22304982 Fax No : 22305899	West Bengal, Sikkim, Odisha, Assam, Arunachal Pradesh, Manipur, Meghalaya, Mizoram, Nagaland, Tripura, Bihar and Jharkhand
		Email : nbfcokolkata@rbi.org.in	

Address and Area of Operation of the Ombudsmen for NBFCs