



Sammaan Capital Limited
(Formerly known as Indiabulls Housing Finance Limited)

Grievance Redressal Policy
(Reviewed and Approved by Board at its meeting held on December 4, 2024)

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1 Introduction & Objectives

In the present scenario of competitive retail lending business, excellence in customer service is the most important element for sustained business growth, increase in market share and improvement in brand value. Customer complaints are part of the business life of any corporate entity as every business has to deal with situations in which things go wrong from a customer's perspective. This is more so for Non-Banking Financial companies as they are service organizations. As a service organization, imparting good customer service and enhancing level of customer satisfaction is our prime concern. Providing prompt and efficient service is essential to attract new customers, as well as to retain existing ones. Increase in market share and building brand value is possible only by providing quality service in the shortest possible time.

This grievance redressal policy of Sammaan Capital Limited (formerly known as Indiabulls Housing Finance Limited) ("SCL") aims at ensuing prompt redressal of customer complaints and grievances. The review mechanism for grievance redressal should also help in identifying shortcomings in product features and service delivery. The escalation provided is to sensitize that the concerned management is made aware of the grievance of the aggrieved party and take a considered view in the matter.

2 Target Audience

The members of the Board and all Departments shall be the primary audience for this document. The document shall not be circulated beyond mentioned individuals without prior permission from the Head of respective Department.

3 Applicability and Validity of the Policy

This policy will become applicable from such date as approved by the Board of Directors. The Board will review, validate, update, and approve the Policy at least once annually. Any revisions in specific aspects of this policy may be communicated through mandates issued by the relevant authority and will become part of this policy from the date they become effective.

4 Objectives of the code

Our policy on grievance redressal follows the under noted principles.

- Customers would be treated fairly at all times.
- Complaints raised by customers are dealt with courtesy and without undue delay.
- Grievances of pensioners physically challenged and senior citizens are dealt with priority.
- Customers are fully informed of avenues to escalate their complaints/grievances within the organization and their rights to alternative remedy, if they are not fully satisfied with the response of SCL to their complaints.
- All complaints are dealt efficiently and fairly otherwise they may damage our reputation and business.
- Our employees would work in good faith and without prejudice to the interests of the customer

5 Application of the code

In order to make our Grievance Redressal Mechanism more meaningful and effective, a structured system has been built up towards the same. This system would ensure that the redressal sought is just and fair and is permissible within the given frame-work of rules and regulation.

However in relation to grievance redressal procedures, we have a complaint form displayed on our website, customers can log in and file their grievances online if wants to do so.

This policy document would also be made available at all branches and on website - www.sammaancapital.com. The concerned employees would be made aware about the Complaint handling process.

A complaint is an expression of dissatisfaction made to an organization, related to its products, or services provided by the Company as well as by it's Outsourcing Partners, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

The reason for customer complaint can be divided into two main categories:

- The behavioural aspects in dealing with customers
- Inadequacy of the working/operations or gaps in standards of services expected and actual services rendered.

The customer has a right to register his complaint if he is not satisfied with the services provided. There are four main ways to complain - in person, by telephone, by post or by registering complaint via complaint form on website or through electronic means. Complaints received through all these channels must be handled efficiently and swiftly. If the complaint is not redressed satisfactorily within 30 days of the receipt of the complaint, customer may write to the RBI or can upload his / her complaint at CMS (Complaint Management System) facility being available at the web site of RBI on link: (<https://cms.rbi.org.in>).

6 Internal Machinery to handle Customer complaints/ grievances

6.1 Complaint Registration

A customer may lodge a complaint in person by visiting any nearest branch, by calling our toll free number, by post or through electronic means, if he/she is not satisfied with the services provided by SCL. All complaints will be recorded by SCL in a database through Customer Relationship Management (CRM).

Arrangements for receiving complaints and suggestions are given hereunder.

Customer can also call through exclusive help line to register his/her complaint. Whenever a complaint is received, the sender will receive a response within three working days acknowledging his/her complaint.

Further whenever any complaint is received in the form of a hardcopy i.e. through any letter etc., same is recorded in CRM. In all such cases, our representative contacts customer at the earliest to find out the exact nature of his/her complaint.

In relation to all complaints received through regulators, we record all such complaints in CRM. After receiving and recording such complaints our representative contacts clients and also finds out the facts of the complaint to resolve them on urgent basis.

Following details are mandatory for lodging the complaint online or offline:

- The complaint must contain the name and address of the Complainant, the name and address of the branch or office of the company against which the complaint has been registered. For filing online complaint the customer need to mention registered mobile no., email ID and correct loan account number.
- Date of Complaint (with Copy of Complaint)
- Facts giving rise to the complaint supported by documents, if any.
- Wherever possible/ applicable nature and extent of the loss caused to the Complainant.
- Relief sought from RBI
- A declaration of compliance with condition mentioned in Form of Complaint.

6.2 Complaints in Person

A Complaint book is available at the branches. A customer can obtain it from the branch and record his/her grievances therein.

Customer may use complaint/ visitors book kept at branch for any feedback/ suggestions for improvement in our products and services.

6.3 Call Centre

Complaints can also be lodged at SCL's Call Centre on toll free number 1800-572-7777. Whenever a complaint call is received, sender receives a reply back confirming acknowledgement of his complaint.

6.4 Complaints through mail / Email

Customer can also submit his/her complaint by post or by registering complaint via complaint form on website. Complaints received shall be acknowledged by e-mail. Whenever a complaint call is received, the sender receives a reply back on his/her registered email ID confirming acknowledgement of his complaint. Complaints can also be lodged at SCL's via form displayed on our website at below mentioned link- <https://www.sammaancapital.com/contact-us/customer-service>

Customer can take forward his complaints to higher levels online, if his grievances are not resolved within the specified period.

In case the complainant is not satisfied with the outcome and if the complaint is not redressed satisfactorily within 30 days of the receipt of the complaint, customer may write to the RBI or can upload his / her complaint at CMS (Complaint Management System) facility being available at the web site of RBI on link: (<https://cms.rbi.org.in>).

Sammaan Capital Limited adheres to the guidelines of Reserve Bank of India (Internal Ombudsman for Regulated Entities) Directions, 2023

7 Resolution of Grievances

7.1 Grievances related to attitudinal aspects

Such complaints would be handled courteously, sympathetically and above all swiftly. Misbehaviour/ rude behaviour with customers be treated at Zero tolerance level and immediate

action is to be taken. SCL, under no circumstances, tolerate misbehaviour of any degree by our staff members.

7.2 Grievances relating to transactions / operations / Outsourced Agency:

Primarily Branch is responsible for the resolution of complaints/grievances in this category. Branch would be responsible for ensuring rectification of entry / transaction or satisfaction of customers. It also includes the issues relating to services provided to the customer by the outsourced agency. It is the foremost duty of the branch to see that the complaint is resolved to the customer's satisfaction and if he/she is not satisfied, then to provide him with alternate avenues to escalate the issue. In case, it is not getting resolved at branch level, they can refer the case to Head Office for guidance/resolution.

7.3 Unsatisfactory resolution

In case customer is unhappy with the service or redressal provided by SCL, he can also approach RBI for redressal. The contact details are displayed at each branch.

8 Time Frame

Complaints are to be seen in the right perspective because these indirectly reveal a weak spot in the working of the Company. Complaints received would be analyzed from all possible angles. SCL will endeavour to send a written/ email acknowledgement within three working days of receipt. Acknowledgement shall be given by Grievance desk to the complainant along with time taken for resolution. Complaint should be resolved and communicated to the complainant within 30 days from the date of receipt.

Time matrix for dealing complaint redressal process with escalation matrix for various nature of complaints has been given in Annexure. Departments/officials dealing with the customer complaints are required to strictly adhere to the same.

Periodical MIS on complaint is generated and circulated amongst the senior officials of the Company for their knowledge and further instructions, if any.

9 Review & Reporting Mechanism

9.1 Customer Service Review by Customers' Grievance / Risk Management Committee :

There is a specific service committee of the Management which is chaired by the Managing Director, Chief Operating Officer and has other senior members of SCL as its constituents. The committee periodically reviews major areas of customer grievances and measures are taken to improve customer service.

In a complaint review, the focus is to ensure that the complaints are duly addressed and any policy, process or manpower concerns are corrected in a way that there is no re-occurrence of these issue again. Customer Satisfaction and Quality assurance are the two major goals for conducting this review. The committee would also consider unresolved complaints/ grievances and may offer its advice with respect to below-

- Focus on the Turn Around Time- reviewing the cause for out of TAT complaints
- Root cause analysis of complaints
- Evaluate feed-back on quality of customer service received from various quarters, across various customer contact modes and finalize the improvements

In such periodical reviews which shall be done atleast on Quarterly basis by Board Committee / Board, reporting of all such cases where IO decisions were overruled by MD has to be ensured.

The Internal Ombudsman shall furnish periodic reports (including the analysis of complaints) on his / her activities to the Committee of the Board handling customer service and protection, preferably at quarterly intervals, but not less than half yearly intervals.

9.2 Nodal Officer / Grievance Redressal Officer to handle complaints and grievances:

Aggrieved customers can write directly to the Head Customer Care/ Nodal Officer / Grievance Redressal Officer regarding their grievances at the following address:

To the Head Customer Care,

Sammaan Capital Limited
(Formerly known as Indiabulls Housing Finance Limited),
5th Floor, Building No. 27, KG Marg,
Connaught Place, New Delhi - 110001
Phone – 0124 - 6048160

-or-

NODAL OFFICER / GRIEVANCE REDRESSAL OFFICER

To

Mr. Amit Kumar
Deputy General Manager, Nodal Officer / Grievance Redressal Officer
Sammaan Capital Limited
(Formerly known as Indiabulls Housing Finance Limited),
5th Floor, Building No. 27, KG Marg,
Connaught Place, New Delhi - 110001
Phone: 0124-6048088

Email – amit.k44@Sammaancapital.com

9.3 Regulatory Reporting:

Regulatory reporting to RBI shall be ensured as per extant instructions / Guidelines by RBI under the Fair Practice Code prescribed by RBI besides Master Direction - Reserve Bank of India (Internal Ombudsman for Regulated Entities) Directions, 2023 / RBI Integrated Ombudsman Scheme 2021 or other such Guidelines from time to time.

10 Mandatory Display Requirements

SCL provides:

- Appropriate arrangement for receiving complaints and suggestions.
- The name, address and contact number of Nodal Officer / Grievance Redressal Officer / Branch Heads.
- Contact details of RBI i.e.

Centralized Receipt and Processing Centre (CRPC),
Reserve Bank of India, Central Vista, Sector 17, Chandigarh – 160017.

- Display of comprehensive notice board/Booklet containing all policy etc. pertaining to customers for his/her information in Branches. The following notice is to be displayed at all SCL Branches.

ESCALATION MATRIX FOR RESOLUTION OF COMPLAINTS

<p>FIRST LEVEL</p>	<p><i>In case customer has a Request, Query & Feedback, they may refer FAQs. In case they have a complaint, they may write to us on below links-</i> https://www.sammaancapital.com/customer-support Write to Us https://www.sammaancapital.com/customer-support Call Us Customer help line no. 1800-572-7777 (Toll free) Visit Us https://www.sammaancapital.com/customer-support Post Us Head Customer Care, Sammaan Capital Limited (formerly known as Indiabulls Housing Finance Limited), 5th Floor, Building No. 27, KG Marg, Connaught Place, New Delhi – 110001 If customer has not got any response in 7 days or not satisfied with response then they can escalate to next level</p>
<p>SECOND LEVEL</p>	<p><i>In case customer's concern has not been addressed at level 1 or satisfactorily response has not been received, then customer may reach SCL Grievance Redressal via below link</i> Write to Us https://www.sammaancapital.com/grievance-form Call Us Customer help line no. 1800-572-7777 (Toll free) Visit Us https://www.sammaancapital.com/grievance-form Post Us Sammaan Capital Limited (formerly known as Indiabulls Housing Finance Limited), Grievance Redressal, 5th Floor, Building No. 27, KG Marg, Connaught Place, New Delhi – 110001 If customer has not got any response in 7 days or not satisfied with response then they can escalate to next level</p>
<p>THIRD LEVEL</p>	<p><i>In case the customer's concern has not been addressed at level 2 or satisfactory response has not been received, then customer may write to SCL Nodal Officer / Grievance Redressal Officer at below mentioned address-</i> Mr.Amit Kumar Deputy General Manager, Nodal Officer / Grievance Redressal Officer, Sammaan Capital Limited (formerly known as Indiabulls Housing Finance Limited), 5th Floor, Building No. 27, KG Marg, Connaught Place, New Delhi - 110001 Ph: 0124-6048088 Email – amit.k44@Sammaancapital.com</p>

	<i>If customer has not got any response in 7 days or not satisfied with response then can escalate to next level</i>
FOURTH LEVEL	<p>If the complaint is not redressed satisfactorily within 30 days, customer may write to the RBI or can upload his / her complaint at CMS (Complaint Management System) facility being available at the web site of RBI on link: (https://cms.rbi.org.in).</p> <p>Customer may also write through physical letter and post letter on address mentioned below-</p> <p style="text-align: center;">To, Centralized Receipt and Processing Centre (CRPC), Reserve Bank of India, Central Vista, Sector 17, Chandigarh – 160017</p>

11 Interaction with Customers

SCL recognizes that customer's expectation/requirement/ grievances can be better appreciated through personal interaction with customers by their staff. Many of the complaints arise on account of lack of awareness among customers about services offered and such interactions help customers to avail services reducing the number of queries/ complaints at later stage.

12 Sensitizing operating staff for improvement in service & handling complaints

12.1 Lack of knowledge

Complaints occur very often due to lack of knowledge and awareness of the products and services. The Nodal Officer /Grievance Redressal Officer is required to give feedback on training needs of staff at various levels to the Central Training Center.

12.2 Staff Training

SCL deals with customers from different segments, which may give rise to difference of opinion and areas of friction. To deal with customers with a positive attitude and a customer friendly behaviour, the selection of front line staff should be carefully done. With an open mind and a smile on the face, staff should be able to win the customer's confidence. Imparting soft skills is required for handling irate customers; this should be an integral part of the training programs.

Analysis of complaints handled by Internal Ombudsman shall be used in their training programmes to raise awareness about the pattern of complaints including the root causes, remedial measures, etc., among the frontline staff, in order to evolve consistency in handling of complaints. The Internal Ombudsman may also be involved for such trainings, where necessary.

It would be the responsibility of the Nodal Officer/ Grievance Redressal Officer to ensure that the internal machinery for handling complaints/ grievances operate smoothly and efficiently at all levels.

13 Preservation of records

The physical records pertaining to complaint shall be preserved for period of three years from the date of final intimation made to the Complainant in respect of his/ her complaint/ appeal,

whichever is later. This shall not preclude preservation of said record in electronic, magnetic or any other media.

14 Abbreviations

Abbreviations	Details
CRC	Complaint Redressal Cell
CRM	Customer Relationship Management
CMS	Complaint Management System
SCL	Sammaan Capital Limited
RBI	Reserve Bank of India