

## ADANI CAPITAL PRIVATE LIMITED

### GRIEVANCE REDRESSAL POLICY

**Summary of the Policy:** This Policy works as guideline for handling and redressing the complaints/ grievances if any raised by our customers in a time bound manner in compliance with the Directions issued by our Regulator.

The Grievance Redressal Mechanism under this Policy will also deal with the issue relating to services provided by the outsourced agencies engaged by Adani Capital Private Limited ("Company").

This Policy was initially approved by the Board in its meeting held on 29<sup>th</sup> June, 2018 and further updated on 23<sup>rd</sup> May, 2022 to align it with the revised Regulations issued by Reserve Bank of India (RBI).

#### *Objective*

Providing excellent customer service on a regular and consistent basis is a critical concern for the organisation's sustained growth. Handling of Complaints and Grievances is an important activity of any customer-facing organization.

At the same time, we, at Adani Capital Pvt. Ltd. (Hereinafter referred as "Adani Capital"), believe that quick and effective handling of complaints as well as prompt corrective & preventive actions to improve product features and processes are essential to provide excellent customer service to all segments of customers.

This document formalizes an effective and suitable mechanism for receiving and addressing complaints from customers with specific emphasis on resolving such complaints fairly and expeditiously regardless of the sources of the complaints.

Objective of this policy document is to ensure that all issues raised by customers are dealt with courtesy and resolved on time. Company will treat all complaints efficiently and fairly without bias at all times.

#### *Scope*

The processes contained in this policy are applicable to all branches/offices of Adani Capital across the country and to all activities where there is an interaction with customers.

**The policy contains two sections:**

- I. Capturing customer grievances**
- II. Customer grievance redressal guidelines**

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#### Section I- Capturing Customer Grievances

It is endeavour of the company to ensure customer satisfaction by following standard norms and practices, so that complaints from customers are minimized.

The various modes through which customer complaints can be captured are:

Customer Walk-in at a Branch/Office

E-mail

Calling at Call Center

Letter

Further, the complaints and Grievances as raised by the customer are updated and monitored through a System i.e. Freshdesk, which is a cloud-based customer support software that is both feature-rich and easy to use. With multiple support channels available, including live chat, email and phone. To help the customers through their preferred communication method along with monitoring their complaints and grievances.

#### 1. Visibility

Information about how and where to complain would be publicized through websites, display at offices at all locations and through welcome letters

- Front-office staff should be aware of the complaint handling process and the contact details of the organisation's Grievance Redressal Officer and modes through which the customer can register a complaint.
- Contact details for registering complaints should be displayed on the Notice board at branch/office.
- Welcome Kit should contain information about how complaint can be made.
- Toll free number and e-mail address to be mentioned on the mailers or letter sent to customers.
- Contact details of RBI DNBS office where the customer can appeal if complaint registered with the company has not been resolved past 30 days or if the customer is not satisfied with the resolution should also be displayed on the Notice Board at the branch/office.



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## 2. Accessibility

### Customer Walk-in's at Branch/Office

Customers can visit and lodge their complaint at any of the branches/offices of Adani Capital Designated manager/official will attend the customer and try to resolve the problem at his end, if possible.

He will register the complaint with Customer Care Unit describing the nature of the complaint accurately. The complaint will flow to the Customer Care Unit if it is not resolved within stipulated time.

### Email

E-mail ID of Customer care and GRO will be displayed on Notice Board and on Company's official website i.e., [www.adanicapital.in](http://www.adanicapital.in). Customers can write to the designated E-mail ID (as given in this Policy) and lodge official complaint with the company. GRO will be in charge of all the complaints marked to his designated E-mail ID. Complaint will be forwarded by GRO to the concerned person for resolution.

### Phone to Toll Free Number

Customers can lodge a complaint by way of phone to the designated Toll-free number as given in this Policy and also available on the website of the Company. The designated phone number will be displayed on the company website and in all the correspondence sent out to the customer.

Customer care executive handling the Toll-free number will handle the customer and will accept the complaint on phone. (The executive would have access to data base where he can verify the genuine identity of customer)

The executive will capture the customer complaint in Freshdesk.

Complaint will be directed to concerned team for resolution.

MIS of complaints so assigned to various branches/offices, operations, etc is forwarded to GRO on weekly basis by the Call Center team.

### Letter

Customer also has an option of writing a letter addressed to the respective of Branch/Office or to the GRO (in case of escalation as per this Policy) given on website and branches/offices.

The complaint will be directed by GRO to concerned branch/office or department for resolution and will be escalated to higher level in case of delay in resolution.

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#### Complaints received through RBI Department of Non-banking Supervision (DNBS)

Customer can register his complaint with the Officer-in-Charge of the Regional Office of DNBS of RBI, if any complaint reported to the company has not been redressed within a period of 30 days from the date of lodging the complaint with the company or if the customer is not satisfied with the resolution provided for complaint made by him.

#### Complaints received through RBI Ombudsman

Customer can register his complaint through Centralised Receipt and Processing Centre, through physical or online mode i.e. through <https://cms.rbi.org.in>). The complaint, if submitted in physical form as per the contact details given hereunder in the escalation matrix of this Policy, shall be duly signed by the complainant or by the authorised representative. The complaint shall be submitted in electronic or physical mode in such format and containing such information as may be specified by Reserve Bank. The complaint can be sent through RBI as above, provided that:

- a) the complainant had before making Complaint as above, made a written complaint to Adani Capital and i) the complaint was rejected wholly or partly by Adani Capital, and the complainant is not satisfied with the reply; or the complainant had not received any reply within 30 days after Adani Capital 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.
  - iii) the complaint is not abusive or frivolous or vexatious in nature;
  - iv) the complaint to Adani Capital was made before the expiry of the period of limitation prescribed under the Limitation Act, 1963, for such claims;
  - v) the complainant provides complete information as specified in clause 11 of the Reserve Bank - Integrated Ombudsman Scheme, 2021;
  - vi) the complaint is lodged by the complainant personally or through an authorised representative other than an advocate unless the advocate is the aggrieved person.

The complaints received from RBI should be acknowledged promptly (within T+ 1 working day from the date of receipt of the complaint). Complete details of the case,

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reference number, TAT within which the case will be resolved and name, designation & contact details of the person addressing the issue should be communicated in the correspondence.

The complaint should also be raised in Freshdesk for record purpose and tracking. The Company should investigate and resolve the matter within the specified timeline. and the resolution should be communicated to the RBI.

If the matter is complicated and GRO is not empowered to take decisions relating to the issue, then a detailed report giving an insight of the issue, addressing the inadequacies in the process or policy if any, suggesting/recommending appropriate solution to the problem must be submitted to management.

Based on the decision or remedy received from the decision making committee/official, appropriate action should be taken and communicated to the Customer Care Unit, who in turn will communicate the resolution of complaint to the RBI. Care should be taken that the issue is resolved within the TAT communicated. If there is a possibility of delay in resolving the matter, then the same should be informed to RBI along with the revised timeline.

#### Section II – Customer Grievance Redressal Guidelines

It is extremely essential that all the complaints lodged should be efficiently and effectively resolved within the specified TAT.

#### *Customer Care Unit*

Customer Care activities shall be managed by Customer Engagement Department of the Company.

Responsibilities of Customer Care Unit:

1. Complaints received from the customers through various channels will be first logged in the Freshdesk portal by Customer care unit;
2. The complaint will then be forwarded to appropriate person in concerned Branch /department;
3. Monitor resolution of customers' complaints within the prescribed TAT and to do necessary follow-up with concerned officials. Escalate the complaint to higher level when needed;
4. Investigate repeat complaints from customer/s within a quarter;
5. Attend complaint/s forwarded by the Reserve Bank on priority basis. Forward the status to Compliance cell on resolution of complaint/s.

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6. Maintain data base of complaints received and closed.

If complaint cannot be resolved within prescribed TAT, then customer care unit must respond to customer that his/her complaint is being investigated and that the company will respond within next 7 days. It is necessary that GRO must be kept informed.

**REDRESSAL OF CUSTOMER GRIEVANCES**

*Dear Customers,*

*You may login your complaint relating to services provided by Adani Capital as under :*

- 1. Walk-in at Branch/Office or*
- 2. Call Toll free number at 18002100444 or*
- 3. Send email to [customercare.acpl@adani.com](mailto:customercare.acpl@adani.com) or*
- 4. Send Letter addressed to the respective Branch In-charge/Branch Manager*

In case complaint is not resolved within 15 working days, you can escalate the same as under:

**Escalation Matrix**

**Escalation: Level 1 : Grievance Redressal Officer (GRO)**

<b>Name &amp; Address</b>	<b>Email</b>	<b>Contact Number</b>
<b>Grievance Redressal officer</b>  Mr. Anurag Pandey- Head - Customer Engagement & Experience.  Adani Capital Pvt. Ltd. 1004/5, C-Wing, One BKC, C-66, G Block, Bandra Kurla Complex, Mumbai-400051	escalations.acpl@adani.com	022-62827068  Timings: 10:00 AM to 5:00 PM (Monday to Friday)

Our Grievance Redressal Officer will endeavour to resolve the issue to the complainant's satisfaction within 15 working days. In case, the complaint needs more time to examine, the complaint shall be acknowledged by explaining the need for more time to respond with detailed reason.

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**Escalation: Level 2 : Officer-in-Charge, Regional Office, RBI**

<b>Name &amp; Address</b>	<b>Email</b>	<b>Contact Number</b>
Officer- in- Charge Reserve Bank of India, Department of Supervision, Ashram Road, Ahmedabad-380014	<a href="mailto:dosahmedabad@rbi.org.in">dosahmedabad@rbi.org.in</a>	079-27543057 Timings : 10:00 AM to 5:00 PM (Monday to Friday)

If the complaint is not resolved within 30 days from the lodgement of the complaint or if the complainant is not satisfied with the response, the customer can approach Officer-in-Charge appointed by Reserve Bank of India, as above.

Or

**Escalation: Level 2: The Officer In-Charge-Consumer Education and Protection Cell (CEPC) (As per RBI Circular on Co-Lending by Banks and NBFCs to Priority Sector)**

<b>Name &amp; Address</b>	<b>Email</b>	<b>Contact Number</b>
Officer- in- Charge Consumer Education and Protection Cell Reserve Bank of India 3rd Floor, Nr. Income Tax Ashram Road Ahmedabad-380 014 Telephone: 079-27540955	<a href="mailto:crpc@rbi.org.in">crpc@rbi.org.in</a>	079-27543057 Timings : 10:00 AM to 5:00 PM (Monday to Friday)

Or

**Escalation: Level 2: Office of Ombudsman, Reserve Bank of India (As per provisions of Reserve Bank- Integrated Ombudsman Scheme, 2021)**

<b>S. No.</b>	<b>Centre</b>	<b>Address of the Office of NBFC Ombudsman</b>	<b>Area of Operation</b>
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



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2	Mumbai	C/o Reserve Bank of India RBI Byculla Office Building Opp. Mumbai Central Railway Station Byculla, Mumbai-400 008 STD Code: 022, Telephone No : 2300 1280 Fax No : 23022024	Maharashtra, Goa, Gujarat, Madhya Pradesh, Chhattisgarh, Union Territories of Dadra and Nagar Haveli, Daman and Diu
3	New Delhi	C/o Reserve Bank of India Sansad Marg New Delhi -110001 STD Code: 011, Telephone No: 23724856 Fax No : 23725218-19	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-700001 STD Code: 033, Telephone No : 22310217 Fax No : 22305899	West Bengal, Sikkim, Odisha, Assam, Arunachal Pradesh, Manipur, Meghalaya, Mizoram, Nagaland, Tripura, Bihar and Jharkhand

The complaint can be made to Consumer Education and Protection Cell or Ombudsman-RBI as above, if it is rejected wholly or partly by Adani Capital, and the complainant is not satisfied with the reply; or the complainant has not received any reply within 30 days after Adani Capital received the complaint, as per the Reserve Bank- Integrated Ombudsman Scheme, 2021.

This policy is to be reviewed by the Board once in a year. In case of change/amendment in the applicable regulatory provisions, the applicable regulatory provisions as in force, will prevail over this Policy.

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