



**GRIEVANCE REDRESSAL POLICY**

**OF**

**INDCREDIT FINCAP PRIVATE LIMITED**

**(Formerly known as INDmoney Fincap Private Limited)**

**Document Control**

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## 1. Preamble

INDcredit Fincap Private Limited (*Formerly known as INDmoney Fincap Private Limited*) (hereinafter “the Company”/ “We”) is a Non-Banking Financial Company (NBFC), registered under Section 45- IA (5) of the Reserve Bank of India Act, 1934.

The Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025 read with Reserve Bank of India (Non-Banking Financial Companies – Credit Facilities) Directions, 2025, as amended from time to time (“RBI Guidelines”) prescribes the NBFCs to lay down appropriate grievance redressal mechanisms within the organization to resolve the grievances of the Company’s customers.

Accordingly, the Company has prepared and adopted this grievance redressal policy/ mechanism with an objective of establishing a robust and transparent mechanism for addressing and resolving grievances of the Customers of the Company within stipulated timelines and to ensure that the Customers complaints / grievances are handled effectively and prudently, taking into consideration the regulatory timelines and redressal mechanisms.

## 2. Objective

The objectives of this Policy are to:

- Ensure that all customers are treated fairly, courteously and without bias.
- Provide an accessible mechanism for customers to lodge their grievances/complaints.
- Resolve grievances within a defined timeframe and keep the complainant informed of the status.
- Ensure that the Customers are fully made aware of their rights and informed of all avenues to register / lodge their grievances along with appropriate escalation mechanisms within the Company and their rights to alternative remedy if they are not fully satisfied with the response of the Company to their grievances.
- Ensure that all grievances are escalated internally in a structured manner, and that unresolved matters may be referred to the appropriate regulatory forum as applicable.
- Review complaints to identify root-causes and implement corrective actions, thus improving service quality and reducing recurrence.

## 3. Scope & Applicability

This mechanism applies to:

- All customers (existing and prospective) of the Company, with respect to products and services offered by the Company.
- All business lines, including lending, credit, post-disbursement services, and any other financial services the Company offers.
- The mechanism also covers grievances relating to services provided by the Company via third party / partner agencies including Lending Service Providers (“LSPs”), Technology Service Providers (“TSPs”), etc. The scope of this policy shall cover all our personnel who are interacting with the users including our outsourcing partners.
- Further, the company shall ensure redressal of grievances of persons with disabilities under the Grievance Redressal Mechanism already in place.

This mechanism specifically excludes:

- complaints that are incomplete or not specific in nature.
- communications in the nature of offering suggestions.
- communications seeking guidance or explanation.
- complaints which are not related to the product/ services offered by the Company and are beyond the provisions of the Act and the rules and regulations framed there under.
- complaints that are sub-judice (cases which are under consideration by a court of law or quasi-judicial body) and/ or are beyond the control of the company such as where there is

regulatory involvement, but the Company will nevertheless direct the complainant to the appropriate forum.

#### 4. Definitions

- **Grievance/Complaint** means a representation in writing or through other modes as defined in the Grievance Redressal Policy alleging dissatisfaction with a service on the part of the Company and seeking relief under the Scheme.
- **Customer/ Complainant:** A person or entity who has borrowed, is in the process of borrowing, or is using the services offered by the Company.
- **Grievance Redressal Officer (GRO):** The officer designated by the Company to handle customer grievances at a specified level.

#### 5. Governing Framework & Regulatory References

This Policy is framed in accordance with:

- Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025, as amended from time to time.
- Reserve Bank of India (Non-Banking Financial Companies – Credit Facilities) Directions, 2025, as amended from time to time.

#### 6. Responsibilities of the Board & Senior Management

- The Board of Directors shall approve this Policy and review its functioning annually or as and when required.
- The Grievance Report detailing the customer complaints along with ageing analysis of both resolved and unresolved complaints and complaints received from the Reserve Bank of India shall be placed before the Board of Directors on quarterly basis for its review. The Board shall Oversee the grievance report presented by the Grievance Redressal Officer on a quarterly basis and ensure that the Company adheres to sound grievance redressal practices and standards.
- The Grievance Redressal Officer shall ensure the mechanism is implemented, monitored, and undertake any changes required to make this policy more effective and compliant with the RBI guidelines.

#### 7. Channels for Submission of Grievances

Customers may lodge grievances through any of the following channels:

- a. **Customer Support section:** If a user has any grievance / complaint, he/she can approach the Company's Support team via the "Customer Support" tab in the INDcredit mobile application.
- b. **Call Customer service helpline:** +91 9217178023 (**Monday to Friday, 10:00am- 7:00pm**)
- c. **Email:** The user may write to ([support@indcredit.com](mailto:support@indcredit.com)) from the email id registered with the Company, with attention to the Customer Service team or [grievance@indcredit.com](mailto:grievance@indcredit.com) from the email id registered with the Company, with attention to the Grievance Redressal Officer.
- d. **Letter:** Customer may raise the grievance by writing us to the following address:  
To the attention of: Grievance Redressal Officer (GRO)  
Address: INDcredit Fincap Private Limited ,  
617, 6<sup>th</sup> Floor, Suncity Success Tower, Golf Course Extension Road, Sector-65,  
Gurugram, Haryana-122005

#### 8. Registration and Acknowledgement

- On receipt of a complaint/grievance, the Company shall register it in its complaints management system and assign a unique reference number.
- The Company shall provide an acknowledgement to the complainant within **2 working days** of receipt of the same, with the unique reference number.

*Please note that it shall be the primary responsibility of the complainant to ensure that they quote their registered email id/ registered contact no. complaint reference no. in every correspondence with the Company regarding their complaint. The Company shall neither entertain any anonymous complaint, nor it shall entertain any complaint from third parties unless and until the Company has received any written approval from the concerned user.*

## 9. Resolution Timelines and Escalation Matrix

- The Company shall endeavour to resolve all grievances within a maximum of **one month** from the date of receipt of the complaint, unless otherwise specifically extended for valid reasons.
- If a grievance is not resolved within the specified timeframe, the complainant will be informed of the reasons for delay and the expected resolution date.
- Escalation levels:
  - **Level 1: Customer-Service Team (initial handling).**  
The Company will provide a response to the customer within 7 working days of registering the complaint through email along with proper justification and reason. The Customer-Service Team shall ensure that any grievances not resolved within 7 working days of receipt of grievance shall be escalated to Level 2 as per the below.
  - **Level 2: Grievance Redressal Officer**  
If the complainant is still unsatisfied with the response of Level 1 or the complaint is still unresolved within specific timeframe, the complaint can be escalated to the Company's Grievance Redressal officer ("GRO"). The name and the contact details of GRO shall be made available on the Company's website / app.  
The Grievance Redressal Officer of the Company will examine the matter and redress to complaints as soon as possible.  
On receipt of the said complaint, GRO shall ensure that grievances are resolved within 15 working days from the date of registering the complaint under Level 2.  
However, notwithstanding anything contained above, the Company shall ensure that all the grievances are resolved not later than one month from the date of registering the complaint/ grievance.
  - **Level 3:** If the customer is still unsatisfied with the response of Level 2 or the complaint is still unresolved within specific timeframe, the customer may appeal to the Officer-in-Charge of the Regional Office of the RBI at:  
6, Sansad Marg,  
New Delhi - 110001, India.  
Tel: +91-11-23325225  
Fax: +91-11-23711250  
Email: rdnewdelhi@rbi.org.in

### Closure/ Resolution of the Complaint

The Grievance/ Complaint shall be considered as disposed off and closed in any in the following cases:

- The Company has acceded to the request of the complainant fully.
- Where the complainant has indicated in writing, it's acceptance of the response and satisfaction with the same as received from the Company.
- The complainant has not responded within one month of receipt of the written response from the Company.

## 10. Display & Publicity

The Company shall display the details of the Grievance Redressal Officer(s), contact details (phone, email, address) at office and on the Company's website.

## 11. Tracking, Monitoring & Reporting

- The Company will maintain a MIS (Management Information System) of all grievances received, resolved, pending, time-to-resolution, recurring issues and analysis of root causes.

- The MIS shall be reviewed by the Grievance redressal officer periodically and the actions or the changes required in the system shall be communicated further to the operations team.

## **12. Root Cause Analysis & Corrective/Preventive Action**

- The Company will analyse complaint trends and identify recurring patterns or systemic issues.
- Where required, process improvements, training of staff, revision of product terms, consumer disclosures, improvement of systems will be undertaken to prevent recurrence of similar complaints.
- Such remedial actions will be documented and shared with the Board.

## **13. Confidentiality & Record-Keeping**

- All grievance records will be treated as confidential and must be shared only on need basis except where disclosure is required by law or regulation.
- The Company shall retain records of complaints, investigation, decision, correspondence, resolution and appeals for a minimum period of **10 years** for audit/regulatory inspection.

## **14. Review of the Policy**

This policy shall be reviewed annually by or upon significant regulatory changes and any changes shall be approved by the Board. The Board shall also review the functioning of the Grievance Redressal Mechanism periodically. A consolidated report of such reviews shall be submitted to the Board at regular intervals, as may be prescribed by it.

## **15. Effective Date**

This Policy is effective from **the Board approval date** and supersedes any earlier grievance-redressal policy of the Company.

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