

HEDGE FINANCE LIMITED

**Reg. Off.: HEDGE HOUSE MAMANGALAM PALARIVATTOM P.O,
KOCHI, Kerala – 682025**

CIN: U65923KL2011PLC027672

HEDGE FINANCE LIMITED	
POLICY	GRIEVANCE HANDLING POLICY
VERSION	1.0
DATE OF APPROVAL BY THE BOD	13.08.2021

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GRIEVANCE HANDLING POLICY

I INTRODUCTION

This document outlines the policy that is available to a customer who is dissatisfied with the personnel or with a product or service offered or provided by the company and has not spoken/ spoken to the relevant staff and is dissatisfied with the response given.

II NEED FOR THE POLICY

This is required as per extant RBI guidelines vide its Circular Master Circular Ref. No. DNBS.PD.CC.No. 320/03.10.01/2012-13 dated February 18, 2013 on Grievance Handling among other issues.

III SCOPE

This document applies to Hedge Finance Limited (HFL).

IV DEFINITION

Grievance: Grievance under the scope of this policy includes, not limited to –

- a. Observation - A customer notices or learns something about which the organization should be aware.
- b. Concern About Discrimination – A customer is concerned that he/she is being discriminated against.
- c. Concern About Harassment – A customer feels that he/she is being threatened or disturbed.
- d. Concern About Sexual Harassment – A customer feels that he/she is being subjected to unwanted sexual advances.

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- e. Concern About Unfairness – A customer feels that he/she is not being treated in a just manner.
- f. Concern About Integrity – A customer has reason to believe that the staff they are interacting with are not being ethical or adhering to integrity standards (E.g., lying, cheating, or stealing)
- g. Concern About Violation of Guiding Principles/ Processes – A customer has reason to believe that the staff they are interacting with has violated the KGFS guiding principles/ any other process violation that they are aware of/ briefed about.

V PRINCIPLES GOVERNING GRIEVANCE HANDLING

HFL is committed to maintaining a Grievance handling system which can be accessed by all customers.

- a. All grievances are handled in a confidential manner and with a similar level of professionalism as all other official business of HFL and periodic communication/ update to customer until resolution is ensured.
- b. Each grievance should be handled by a person at least one level higher than the person against whom grievance has been raised.
- c. The values as articulated in the HFL guiding principles are preserved and supported by the grievance handling system.
- d. Any grievance which comes under the purview of Sexual Harassment or under the purview of Whistle Blower policy will be dealt in accordance with the provisions of the respective policy and the timelines as specified shall be applicable.
- e. The complaint received / observed at the branch shall be forwarded to HO within say 48 hours

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VI POLICY

HFL is committed to maintaining its guiding principles and ensure integrity, responsibility and fair dealing in all customer transactions/interactions, and will continue to strive to maintain the highest standards in its dealings with the community. In order to maintain these standards, HFL is dedicated to identifying, investigating, and resolving complaints and grievances of its customers. HFL recognises the importance of transparency in decision making and the need to provide a fair and objective procedure for the review of all decisions. Grievances will be dealt with utmost confidentiality and HFL encourages all its customers to provide feedback which will help enhance organisational effectiveness.

VII PROCEDURE

1. Grievance can be submitted in person/ in writing or over phone and the following method can be used:
 - a. Telephonic: A common/helpline number is displayed at the branch for customers to lodge their grievances/complaints over phone.
2. If the grievance is raised in person, it is the responsibility of the senior employee to record the issue with helpdesk and resolve the issue/ take the help of grievances officer to resolve the issue. On resolution, he has to notify the Helpdesk with complete details. If a call is lodged with the helpline/common number, then it is directly handled by the Helpdesk team and it is their responsibility to resolve the issue with the help of grievances officer.
3. Process of Recording of Grievance by Helpdesk
 - a. All the grievances either resolved or pending are documented with complete details including the date of resolution.
 - b. The soft copies / hard copies of the complaints received from the customers are preserved by the Helpdesk, for future reference.

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4. When a grievance is raised, an acknowledgment is provided to the concerned customer.

Periodic Communication/ Update:

Customer raising a grievance is updated on the status of their Grievances on a fortnightly basis until it is resolved. The intimation could be by way of oral or written communication and a record to be maintained.

- 5 .The Grievances Redressal Officer is responsible for resolving the grievance and will initiate appropriate action as deemed fit. Mr. Shajan K S, a Senior Employee of the company will be the Grievances Redressal Officer of the company.
6. Any action initiated will be communicated to the helpdesk and documented.
7. In cases, where investigation is required, it will be handled by Head – Operations and handled in accordance with the Disciplinary Action procedure.
8. In case of an investigation, HFL ensures that each employee is given a fair chance for hearing by an impartial panel selected by the Head - Operations or the CEO in the event that a concern is raised against the Head - Operations.
9. If the grievance requires any legal intervention, then it will be acted upon accordingly.

VIII EMPLOYEE RESPONSIBILITIES

- 1.It is the responsibility of every branch employees to keep the customers informed of the Grievance redressal mechanism and keep them updated of the changes in the system;

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2. It is the responsibility of every manager to be proactive in ensuring that all reasonable measures are taken to address situations before they become grievances and to uncover concerns;
3. Every employee is responsible for using the Grievance handling system in good faith and with the intention of supporting and protecting the interest of the customers;
4. In the event that a grievance is raised, any employee of HFL may be asked to participate in the resolution of that concern. Each employee is responsible to cooperate fully with the process.

IX GRIEVANCE RESOLUTION

The customer will be communicated on a Fortnightly basis about the status of their grievance till it is resolved.

While resolving -

- A customer gets a better understanding of the situation as the concerns are addressed

X DOCUMENTATION

Company Secretary is responsible for maintaining the records of the grievances received under the policy. The record should contain the details of the grievances raised along with the complete information on the complainant, alleged person, enquiry findings and action taken. All communications pertaining to these grievances will be documented. Company Secretary must also record the results of every investigation and related action for a minimum period of seven years.

XI AUDIT

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Grievance handling shall form part of HO Operations/ Process audit and the Audit shall monitor adherence to the provisions listed under this policy. Internal Auditors/ External Auditors as appointed for the purpose of Operations/ Process Audit has every right to review the Grievance records being maintained by Company Secretary/Grievances Officer and can also get in touch with Customers (if required) to understand the resolution provided. Customer interaction shall happen in the presence of the officials (as decided by the Auditor).

XII IMPLEMENTATION

This would be implemented with immediate effect. There will be an identified Official along with details like name, contract details (telephone/mobile no./e-mail address) who can be approached by the Customer for resolution of complaints against the Company. In addition, if the complaint/ dispute is not redressed within a period of one month, the customer may appeal to the Officer-in-charge of the Regional Office of DNBS of RBI (with contact details), under whose jurisdiction, the registered office of the NBFC falls.

The contact no. and e-mail address of the identified Official should also be displayed in all the branches.

For grievances relating to NCDs and Equity Shares , contact person is:

Company Secretary: Girish Kumar

Email id: girish.kg@hedgegroup.in
