



Archbridge  
CAPITAL

## GRIEVANCE REDRESSAL POLICY (GRP)

### ARCHBRIDGE CAPITAL PRIVATE LIMITED

#### Version Control

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#### **Registered and Corporate Address:**

Archbridge Capital Private Limited (CIN:  
U64990HR2024PTC123760) DCG - 4, 1011 - 1018, DLF Corporate  
Greens,  
Sector 74A, Southern Peripheral Road,  
Gurugram, Narsinghpur, Gurgaon, Narsinghpur,  
Haryana, India, 122004.  
[www.archbridgecapital.in](http://www.archbridgecapital.in)

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## **1. BACKGROUND**

**ARCHBRIDGE CAPITAL PRIVATE LIMITED (henceforth referred to as "Company" or "ACPL")** believes in conducting its affairs in a fair and transparent manner by maintaining the highest levels of integrity, honesty and ethical behavior while dealing with its customers ("Customers").

In compliance with the guidelines issued by the Reserve Bank of India ("RBI") including the Reserve Bank of India (Non-Banking Financial Company - Scale Based Regulation) Directions, 2023 and the Reserve Bank - Integrated Ombudsman Scheme, 2021, as applicable to non-banking financial companies for maintenance of an appropriate grievance redressal mechanism within the organization to resolve the complaints and grievances of its customers, the Company has formulated this Grievance Redressal Policy ("Policy") setting out the procedure for receiving, registering and disposing of the complaints and grievances of the Customers with respect to the products and services of the Company ("Complaints"), including but not limited to the Complaints in relation to the services provided by the third party agents or business facilitators appointed by the Company for providing such services on behalf of the Company.

This policy on Grievance Redressal of **ARCHBRIDGE CAPITAL PRIVATE LIMITED (henceforth referred to as "Company" or "ACPL")** is set out as a mechanism to enable the customers of the company to file their complaints or grievances or give their feedback and suggestions in relation to their dealings with the Company and to address the same promptly, by following the provisions as laid down herein.

This Grievance Redressal Policy describes the various channels available to the Company's customers for lodging their complaints, obtaining the right redressal solutions from the concerned department and the Company's mechanism for responding to customers within the stipulated time period.

Since RBI would issue circulars and instructions on an ongoing basis, any subsequent amendment to the above circular would update in the Policy accordingly.

## **2. OBJECTIVE OF THE POLICY**

The company believes in providing prompt and efficient services to not only attract new customers, but also to retain existing ones. With this objective of serving its customers in a time-bound and efficient manner, the Company has drafted this Grievance Redressal Mechanism. The Company's policy, on grievance Redressal, has been formulated considering the following objectives:

- a) The Customers are treated fairly and without bias, at all times.
- b) The Complaints raised by the Customers are dealt with courtesy and resolved in a timely manner.
- c) The Customers are informed of the avenues to escalate their Complaints within the Company.
- d) The Customers are informed of their rights so that they can opt for alternative remedies if they are not fully satisfied with the Company's response or resolution to their Complaints.

In order to make the Company's redressal mechanism more meaningful and effective, a proper structure shall be implemented to ensure that the redressal sought is fair and within the given framework of rules and regulations of the Company. The customer shall have every right to register his/her complaint if he/she is not satisfied with the services provided by the company or any other agencies associated with the company.

Customers can file complaints in writing or over the telephone or through e-mail. In case the complaint is not resolved within the given time or if he/she is not satisfied with the solution provided by the Company, the customer shall have the right to use other legal avenues with their complaint for grievance redressal.

At **ACPL**, customer service and satisfaction shall be the primary objective. Our constant efforts to ensure utmost client satisfaction will ensure that the redressal sought is just and fair and is within the given framework of rules and regulations.

### **3. SCOPE OF THIS POLICY**

The grievance redressal processes contained in this Policy are applicable to all employees (permanent as well as contractual) and offices of the Company and to all activities where there is an interaction with prospective or existing customers.

A “Customer” is a person or entity that has availed a loan from the Company

A “Complaint” or “Grievance” is an expression of dissatisfaction (justified or unjustified) conveyed to the company either orally or in writing, regarding any of its products, services, processes, employee behavior, or its failure to meet commitments or regulatory guidelines.

### **4. CORE COMMITMENTS**

The Company is committed to its objective of ensuring the highest levels of customer satisfaction and has, therefore, set out the following guidelines to be followed for redressal of each complaint by its customers:

#### **To act fairly and reasonably in all dealings with its customers by ensuring that:**

- a) All products and services meet relevant laws and regulations, as applicable from time to time;
- b) Customer dealings are honest and transparent; and
- c) The process and procedures of the Company are in the best interest of its customers.

#### **To assist customers in selecting financial products and services by:**

- a) Providing relevant information in English and/or a local language of choice;
- b) Explaining the financial implications of any product and service; and
- c) Allowing the customer to choose the one that meets his/her needs.

#### **To make every attempt to ensure that the customers have a trouble-free experience while dealing with the Company and its employees.**

In case of errors of commissions and/or omissions, the Company will deal with the same on priority by:

- a) Correcting mistakes;
- b) Addressing customer complaints;
- c) Guiding the customer on the escalation process in case of any dissatisfaction; and
- d) Reversing any charges including interest applied to a customer's account due to an error or oversight by the Company.

### **5. GROUND OF FILING COMPLAINTS**

Customers can file/register compliant(s) on the following grounds mentioned under clause 8 of Ombudsman Scheme for NBFCs, 2018, in writing containing the nature of grievance/deficiency, inter alia, with regard to:

- a) non-payment or inordinate delay in the payment of interest on deposits;
- b) non-adherence to the Reserve Bank directives, if any, applicable to rate of interest on deposits;
- c) non-repayment or inordinate delay in the repayment of deposits;
- d) non-presentation or inordinate delay in the presentation of post-dated cheques provided by the customer;

- e) failure to convey in writing, the amount of loan sanctioned along with terms and conditions including annualized rate of interest and method of application thereof;
- f) failure or refusal to provide sanction letter/ terms and conditions of sanction in vernacular language or a language as understood by the borrower;
- g) failure or refusal to provide adequate notice on proposed changes being made in sanctioned terms and conditions in vernacular language as understood by the borrower;
- h) failure or inordinate delay in releasing the securities documents to the borrower on repayment of all dues;
- i) levying charges without adequate prior notice to the borrower/ customer **provided** such charges have not been mentioned under schedule of charges as published on the Company's website from time to time;
- j) failure to provide legally enforceable built-in repossession clause in the contract/ loan agreement;
- k) non-observance of directions issued by Reserve Bank to the non-banking financial companies;
- l) non-adherence to any of the other provisions of Reserve Bank Guidelines on Fair Practices Code for Non-Banking Financial Companies.

## **6. COMPLAINT FILING CHANNELS**

Customers can raise their complaints through the following means:

- a) By sending a letter at the Company's office address at **ARCHBRIDGE CAPITAL PRIVATE LIMITED**, DCG - 4, 1011 - 1018, DLF Corporate Greens, Sector 74A, Southern Peripheral Road, Gurugram, Narsinghpur, Gurgaon, Narsinghpur, Haryana, India, 122004, between 10:00 a.m. and 6:00 p.m., from Monday to Friday (except on public holidays);
- b) By Register the Complaint in a complaint register/ complaint box, which is available at all regional / branch offices of the Company at DCG - 4, 1011 - 1018, DLF Corporate Greens, Sector 74A, Southern Peripheral Road, Gurugram, Narsinghpur, Gurgaon, Narsinghpur, Haryana, India, 122004.
- c) By writing an email to the company's dedicated email ID - [customercare@archbridgecapital.in](mailto:customercare@archbridgecapital.in)
- d) Via a telephone call on the helpline number +91-9811489448 between 10:00 a.m. and 6:00 p.m.; from Monday to Friday (except on public holidays);

Each customer will be required to provide the following information while raising a complaint through any of the above-mentioned channels:

- a) Customer's full name as mentioned in the Loan Application Form submitted to the Company;
- b) Customer Identification number;
- c) Customer's complete correspondence address as specified in the Loan Application Form and other documents;
- d) Loan Account Number;
- e) Registered mobile number;
- f) Email ID.

Once a complaint has been lodged through any of the channels mentioned above then such complaint will be handled by the below-mentioned procedures:

- a) Whenever a complaint mail is received, the sender receives a response back within five working days acknowledging his/her complaint.
- b) **ACPL** representative calls/contact the customer at the earliest to find out the exact nature of his/her complaint and provides a unique complaint number for future reference purposes.
- c) After ascertaining the nature of the complaint **ACPL** representative forward such complaint to the respective department and ask for resolution.

- d) Within agreed timeframe, **ACPL** representative provides the complete resolution or request for the time period required due to the complexity and nature of the complaint.
- e) Once the complaint will be resolved feedback department makes a call to the customer for the inquiry customer experience of resolution.
- f) After getting the feedback **ACPL** representative report to the concerned department and close the complaint number or re-opens the complaint number as may be applicable.

## **7. GRIEVANCE REDRESSAL TIMEFRAME**

The timeframe for addressing and resolving a complaint shall **not exceed 30 days** from the date of receipt, regardless of the type or complexity of the grievance. This includes, but is not limited to, general customer complaints related to business practices, lending decisions, credit management, recovery, updating or altering credit information, fraud cases, legal matters, retrieval of historical records, credit report-related issues, and EMI-related concerns.

If, in exceptional cases, the resolution requires more than 30 days, the Company shall inform the complainant of the delay along with the reasons and the revised expected timeline for resolution.

## **8. ESCALATION PROCESS**

If a complaint is not resolved within the stipulated timeframe from the date of its submission, or if the customer is dissatisfied with the response or resolution provided by the Customer Care Department, the Company shall address such concerns through a structured three-tier Grievance Redressal Mechanism designed to ensure fair and timely resolution of customer queries and grievances.

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

If customer is not satisfied by the resolution provided by the customer care department, then such customer may register their query/ complaint to the Grievance Redressal Officer. The details of the Grievance Redressal Officer are given as follows:

Name of Grievance Redressal Officer	Geetaram Purohit
E-mail ID	<a href="mailto:geetaram.purohit@archbridgecapital.in">geetaram.purohit@archbridgecapital.in</a>

**(Between 10:00 a.m. and 6:00 P.M., from Monday to Friday (except on public holidays)**

Complaint to GRO shall be filled within 10 working days from the date of last resolution from customer care department.

### **Level-2: Nodal Officer (NO) of the Company**

If the customer is not satisfied with the resolution provided by Grievance Redressal Officer or the complaint is not resolved satisfactorily then customer may register their query/ complaint to Nodal officer of company. The detail of nodal officer is given below:

Name of Nodal Officer	Sahil Goyal
E-mail ID	<a href="mailto:sahil.goyal@archbridgecapital.in">sahil.goyal@archbridgecapital.in</a>

**(Between 10:00 a.m. and 6:00 P.M., from Monday to Friday (except on public holidays)**

Complaint to NO shall be filled within 15 working days from the date of last resolution from GRO.

### **Level-3: Chief Compliance officer (CCO)**

If the customer is not satisfied with the resolution provided by Nodal Officer or the complaint is not resolved satisfactorily then customer may register their query/ complaint to Chief Compliance officer of company within 15 working days from the date of resolution. The detail of Chief Compliance officer is given below:

Name of Chief Compliance Officer	Soumya Tewari
E-mail ID	<a href="mailto:cs@archbridgecapital.in">cs@archbridgecapital.in</a>

**(Between 10:00 a.m. and 6:00 P.M., from Monday to Friday (except on public holidays)**

### **Level-4: Reserve Bank of India – Integrated Ombudsman Scheme, 2021**

If a customer's complaint is not resolved by the Company within 30 days, or if the customer is not satisfied with the resolution provided, they have the right to file a complaint under the Reserve Bank - Integrated Ombudsman Scheme, 2021.

**Timeline to File:** The complaint must be lodged with the Ombudsman no later than one year and 30 days from the date of the Company's final reply.

#### **How to File a Complaint:**

- a) **Online Portal:** Complaints can be lodged online on the Complaint Management System (CMS) portal: <https://cms.rbi.org.in>.
- b) **Email:** Complaints can be sent via email to [crpc@rbi.org.in](mailto:crpc@rbi.org.in).
- c) **Physical Form:** A complaint in the prescribed format can be sent to the 'Centralized Receipt and Processing Centre' set up at Reserve Bank of India, 4th Floor, Sector 17, Chandigarh - 160017.
- d) **Toll-Free Helpline:** For guidance, customers can call the toll-free number 14448 (9:30 am to 5:15 pm).

#### **Grounds for non-maintainability of a Complaint:**

- a) No complaint for deficiency in service shall lie under the Scheme in matters involving:
  - i. commercial judgment/decision of a Regulated Entity;
  - ii. a dispute between a vendor and a Regulated Entity relating to an outsourcing contract;
  - iii. a grievance not addressed to the Ombudsman directly;
  - iv. general grievances against Management or Executives of a Regulated Entity;
  - v. a dispute in which action is initiated by a Regulated Entity in compliance with the orders of a statutory or law enforcing authority;
  - vi. a service not within the regulatory purview of the Reserve Bank;
  - vii. a dispute between Regulated Entities;
  - viii. a dispute involving the employee-employer relationship of a Regulated Entity;
  - ix. a dispute for which a remedy has been provided in Section 18 of the Credit Information Companies (Regulation) Act, 2005; and
  - x. a dispute pertaining to customers of Regulated Entity not included under the Scheme.
- b) A complaint under the Scheme shall not lie unless:
  - i. the complainant had, before making a complaint under the Scheme, made a written complaint to the Regulated Entity concerned and

- ii. 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
- iii. the complaint is not in respect of the same cause of action which is already-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;
- iv. 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;
- vi. the complaint is not abusive or frivolous or vexatious in nature;
- vii. 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;
- viii. the complainant provides complete information as specified in clause 11 of the Scheme;
- ix. the complaint is lodged by the complainant personally or through an authorized representative other than an advocate unless the advocate is the aggrieved person.

## **8. RESOLUTION OF CERTAIN SPECIFIC GRIEVANCES**

### **Grievances related to behavioral aspects**

Such complaints will be handled courteously, sympathetically and above all swiftly. Misbehavior/rude behavior with customers shall be treated at Zero tolerance level and immediate action shall be taken. The Company, under no circumstances, shall tolerate misbehavior of any degree by staff members.

### **Grievances relating to transactions/operations**

Primarily, the company's brick-and-mortar office shall be responsible for the resolution of complaints/grievances in this category. The office shall be responsible for ensuring rectification of entry/transaction or satisfaction of customers. It shall be the foremost duty of the branch to see that the complaint is resolved to the customer's satisfaction and if he 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 shall refer the case to Head Office for guidance/resolution.

## **9. REPORTING**

All customer complaints received by the Company will be duly tracked, consolidated and recorded, and a complaint MIS will be presented to the Managing Director each month. The complaint MIS shall be presented to the Board of Directors of the Company for review on a quarterly basis.

## **10. CUSTOMER OBLIGATIONS**

To enable us to serve you better and resolve your concerns efficiently, we request our valued customers to kindly adhere to the following obligations while availing grievance redressal services:

- a) Ensure timely repayment of loans, EMIs, fees, and charges as agreed in the loan agreement or other documents.
- b) Ensure funds are transferred only through payment channels approved by the company, no payment to be made on any bank a/c pertaining to any individual employee or third-party representative.
- c) Promptly inform the company about any change of address, telephone number etc. with valid proofs as required.
- d) Furnish accurate, complete, and timely information while registering a complaint.

- e) Attach relevant supporting documents, if any, to aid in quicker resolution.
- f) Interact with our employees and representatives in a courteous and respectful manner.
- g) Refrain from using offensive, abusive, or inappropriate language.
- h) Follow the escalation process outlined in the policy for further redressal.
- i) Provide reference/complaint numbers from previous interactions to facilitate tracking.
- j) Avoid raising duplicate complaints for the same issue within the resolution timeline.

#### **11. REVIEW OF GRIEVANCE REDRESSAL POLICY**

This Policy shall be reviewed annually by the Board of Directors of the Company. Any change/amendment in applicable laws with regard to maintenance of an appropriate Grievance Redressal Mechanism shall be deemed to be incorporated in this Policy by amendment and this Policy shall be accordingly amended as and when required.

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