

AADHAR HOUSING FINANCE LIMITED

GRIEVANCE REDRESSAL POLICY

(Revision Effective from- 7th August 2024)

(Version- VII)

PART I

CUSTOMER GRIEVANCE REDRESSAL POLICY

INTRODUCTION

The purpose of the Policy is to define the Customer Grievance Redressal process for the Company in accordance with the Reserve Bank of India ("RBI") Master Directions, 2021, for Housing Finance Companies, as amended from time to time.

The Policy is aimed to ensure that:

- All Complaints are treated efficiently and fairly.
- Complaints raised by customer are dealt with courtesy and on time.
- Customers are fully aware of avenues to escalate their complaints/grievances within the organization.
- Customer should know about their rights for alternative remedies, in case they are not fully satisfied with response.
- Minimizing instances of customer complaints and grievances through proper service, delivery and review mechanism and
- Prompt Redressal of customer complaints and grievances.

GRIEVANCE REDRESSAL COMMITTEE

AHFL has proposed to form a Customer Grievance Redressal Committee consisting of the following members:

- a. Chief Business Officer (CBO)
- b. Chief Risk Officer (CRO)
- c. Chief Credit & Operations Officer (CCOO)
- d. Chief of Collections and recovery Officer (CCRO)

The Grievance Redressal Officer shall be invited to attend this meeting and provide details of complaints at the meeting.

The quorum shall be 3 members, committee can invite any other functional head to attend the meeting and the Meeting to be held as and when required.

The Committee has the following functions:

- Regularly review the position of complaints received and the action taken on various complaints.
- Evaluate the type of customer complaints received on a quarterly basis and work towards reduction of such complaints with process simplification/streamlining etc.
- · Review all regulatory compliances are followed and implemented,
- Review the TAT/timelines for closure of complaints and how it can be further improved.
- Review unresolved complaints and intervene where required.

GRIEVANCE REDRESSAL MECHANISM

Aadhar Housing Finance Ltd. (AHFL) strives to provide quality services & make the customer satisfied within the framework of the Regulatory Norms, Board/Top Management approved policies, processes & procedures.

AHFL operates the grievance redressal in a decentralized manner, customer can approach the branch net work across the country, they can write and call to the customer care id and customer care number respectively. This way the customer has easy access to employees of the organization.

PUBLICATION OF GRIEVANCE REDRESSAL PROCEDURE

The Company shall inform its customers where to find details of the Company's procedure for handling complaints fairly and quickly. The Company shall clearly display in all its offices / branches and on its website the grievance redressal procedure (e-mail id and other contact details at which the complaints can be lodged, turnaround time for resolving the issue, matrix for escalation, etc.) for lodging the complaints by the aggrieved borrower.

GRIEVANCE REDRESSAL PROCEDURE

Step I

- To redress their grievances, customer can lodge their complaint in writing with the Branch Manager of the Branch
- The complaint can also be registered by making an entry of the complaint/grievance in the complaint register maintained by the branch.
- The customer can also register their complaint at <u>customercare@aadharhousing.com</u> or call on our customer care no. 1800 3004 2020.

The customer shall be responded to with clarification within a week.

The response/ acknowledgement to a customer's complaint shall contain the name and designation of the official who will deal with the grievance. If the complaint is relayed over phone at Company's designated telephone helpdesk or customer service number, the customer shall be provided with a complaint reference number and be kept informed of the progress within a reasonable period.

Step II

In case the customer does not receive any response within the above timeline of **a week** or is not satisfied with the response given by the branch, after 7 days the customer can further escalate the complaint/grievance to the Registered Office, at Bengaluru either by way of a letter addressed to Customer Care Officer/Grievance Redressal Officer of AHFL or through email to be sent at:

The Customer Care Officer/Grievance Redressal Officer: Aadhar Housing Finance Ltd.

Registered Office- 2nd Floor, No.3, JVT Towers, 8th A Main, Road, Sampangi Rama Nagar, Hudson Circle, Bengaluru, Karnataka- 560027.

Email id: grievanceredressal.officer@aadharhousing.com

After examining the matter, the Company shall send the customer its final response or explain why we need more time to respond and shall endeavor to do so within six weeks of receipt of a complaint and he/ she should be informed how to take his/her complaint further if he/ she is still not satisfied.

Step III

If the complainant does not receive a response from the Company within a period of **one month** or is dissatisfied with the response received, the complainant may approach the Complaint Redressal Cell of the National Housing Bank, by lodging its complaints online on the website of NHB or through post to NHB, New Delhi, details mentioned below-

National Housing Bank
Department of Supervision
(Complaint Redressal Cell)
4th Floor, Core 5-A, India Habitat Centre,
Lodhi Road, New Delhi – 110003.
www.nhb.org.in

Link: https://grids.nhbonline.org.in/

The format for making offline complaint is available at link http://www.nhb.org.in/ Grievance-Redressal-System/Lodging-Complaint-Against-HFCs-NHB%E2%80% 93Physical-Mode.pdf

The above details shall be displayed clearly in all its offices / branches and on the website of the Company.

GRIEVANCE REDRESSAL OF INSURANCE CUSTOMERS

The Company holds the Registration of a Corporate Agent (composite) with IRDAI for solicitation of insurance business. It will ensure adherence to the IRDAI Regulations, with respect to redressal of grievances relating to insurance.

The complaints related to insurance products sold by the company will be acknowledged and AHFL will facilitate redressal **within 14 days** of the receipt of such complaint through the respective Insurance Company (ies).

The Insurance customer is advised to follow the below steps for registration and resolution of their complaints.

Step I

- To redress their Insurance grievances, customer can lodge their complaint in writing with the Branch Manager of the Branch
- The customer can also register their complaint at customer care no. 1800 3004 2020 by mentioning their Insurance policy number.

The customer shall be responded to within clarification within a week.

Step II

In case the customer does not receive any response within the above timeline or is not satisfied with the response given by the branch, after 7 days the customer can further escalate the complaint/grievance to the Registered Office, at Bengaluru either by way of a letter addressed to Customer Care Officer/Grievance Redressal Officer/ Principal Officer (Insurance) of AHFL or through email to be sent at:

The Customer Care Officer/ Grievance Redressal Officer / Principal Officer (Insurance):-Aadhar Housing Finance Ltd.

Registered Office- 2nd Floor, No.3, JVT Towers, 8th A Main, Road, Sampangi Rama Nagar, Hudson Circle, Bengaluru, Karnataka- 560027.

Email id: grievanceredressal.officer@aadharhousing.com

The customer shall be responded within a period of 14 days with the resolution of the complaint.

Step III

If the complaint is not resolved or the customer is not satisfied with the resolution provided by the Insurer/AHFL, then at any point in time he or she can:

- Escalate the complaint online through Bima Bharosa System by logging into _ https://bimabharosa.irdai.gov.in/
- Or Call Toll Free Number 155255 or 1800 4254 732
- Or Email to complaints@irdai.gov.in
- Or write to Insurance Regulatory and Development Authority of India (IRDAI), Sy No 115/1, 4th floor, Financial District, Nanakramguda, Gachibowli, Hyderabad 500032
- In rare cases, in case the customer is not happy with the resolution provided by the above, then he/she may be guided to the Insurance Ombudsman.

PART II

INVESTORS & NON-CUSTOMERS GRIEVANCE REDRESSAL MECHANISM

1. Redressal of Queries and Complaints related to Investors, i.e. Non- Convertible Debenture (NCD) holders or Fixed Deposit (FD) holders:

The Company, AHFL is committed to prompt response and resolution of any query or complaint raised by its Debenture holder or Fixed Deposit holders. Further, to strengthening the robust mechanism for redressal of such queries or complaints, we have a separate committee called Stakeholders Relationship Committee, constituted as per provisions of 178(5) of the Companies Act, 2013 and SEBI (LODR) and other applicable statutory provisions. The Scope/Role of the Committee are as follows:

- Regularly review the position of complaints received from Investors and the action taken report of various complaints
- Evaluate the type of Investors complaints received on a quarterly basis and work towards reduction of such complaints with process simplification/streamlining
- Ensure all regulatory compliances are followed and implemented
- Ensure the TAT/timelines for closure of complaints is followed/adhered to
- Review unresolved complaints and offer their advice/correction action on such cases.

The Members of the Stakeholders Relationship Committee consist of minimum 3 Directors out of which at least one shall be Independent Director and the Chairperson shall be a Non-Executive Director.

Quorum will be any two Directors. The Committee meets at least once a year and as and when required.

We also have Registrar and Transfer Agent for our Debentures, to ensure & maintain proper records and data, timely payment of interest /re-payments to Debenture holders and resolving their queries & concern within a TAT, as given in Annexure A & B.

The Company submits the details of all Complaints/Grievance received and resolved, during the quarter, before the Board of Directors, at their meeting. Company also uploads the details of quarterly Complaints/Grievances received and resolved, to Stock Exchange, i.e. BSE/NSE Ltd., as per the applicable provisions of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The Investor can raise their unresolved complaints after **15 days** to the Compliance Officer at the email id : complianceofficer@aadharhousing.com.

For claims pertaining to unclaimed interest/ redemption amount for matured NCDs:

- Please refer to the policy available on the website of the Company at https://aadharhousing.com/customer-relations/ahfl-policies-codes or reach out to the Nodal officer at below provided details:

Ms. Harshada Pathak, Company Secretary & Compliance Officer

Tel. No.: +91-22-4168 9000

Email: complianceofficer@aadharhousing.com

The revised Grievance Redressal Mechanism for Investors, is as per Annexure -A.

2. Redressal of Queries and Complaints related to Shareholders:

- a. The Company always appreciate and acknowledge the confidence reposed by its shareholders on the Company, by providing long term equity capital to accelerate the growth of the Company.
- b. We closely monitor the Queries/Complaints, if any from our shareholders. We keep on communicating and updating them about various information, related to them, like payment and claim of Dividend, Transfer of shares to IEPF, if any etc. We have also appointed Registrar and Share Transfer Agent for handling transfer/transmission and other related activities and records of shareholders.
- c. The Investor can raise their unresolved queries/ complaints or any unsatisfactory reply to their complaints after **30 days** to the Compliance Officer at the email id : complianceofficer@aadharhousing.com or to ROC/MCA.
- d. The Grievance Redressal Mechanism for Shareholders, is as per Annexure B.

3. Redressal of Queries and Complaints related to Non Customers:

- a. Non Customers is referred to individuals/entities, who are only empaneled/ associated/acting as agents directly with the Company for any kind of services availed by the Company, excluding employees and lessors of branch offices properties.
- b. Non customers may send their query or complaint through email to the Company at customercare@aadharhousing.com
- c. Non Customers shall be responded within a period of 7 days from the date of receipt of query or complaint, to resolve the issue
- d. If the query or complaint is not resolved within 15 days or the Non-customers are unsatisfied with the reply/solution provided, then he/she/it can send the email to Grievance Redressal Officer of the Company at grievanceredressal.officer@aadharhousing.com.

Annexure -A

Grievance Redressal Mechanism for Investors such as Debenture/NCD holders & FD holders:

Sr. No	For Privately placed Debentures/NCDs	For Debentures issued under IPO-NCDs
1	Debenture holders may send their query or complaint through email to the Company at Aadhar Treasury All@aadharhousing.com	Debenture holder may send their query or complaint through email to Registrar and Transfer Agent at : einward.ris@kfintech.com
2	The Debenture holder shall be responded within a period of 7 days from the date of receipt of query or complaint, to resolve the issue.	The Debenture holder shall be responded within a period of 7 days from the date of receipt of query or complaint, to resolve the issue.
3	If the query or complaint is not resolved within 15 days or the Debenture holder is unsatisfied with the reply/solution provided, then he/she/it can send the email to Company Secretary & Compliance Officer of the Company at -complianceofficer@aadharhousing.com.	If the query or complaint is not resolved or unsatisfactory, within 15 days or the Debenture holder is unsatisfied with the reply/solution provided, then he/she/it can send the email to Company Secretary & Compliance Officer of the Company at complianceofficer@aadharhousing.com.
	If complaints are not resolved / unsatisfactory to Investors within 30 days, then, the Investor can raise such complaint to BSE or SCORES (SEBI) at their website/portal: scores@sebi.org.in	
	After exhausting all the above options for resolution of the grievance, if the investor/client is still not satisfied with the outcome, he/she/they can initiate dispute resolution through the ODR Portal. The link to the ODR portal is https://smartodr.in/login and is also available on the Company's website.	

Company is committed to resolve the queries related to Debenture holder, with in period of 30 days of receipt of complaint, unless there is any legal or technical error on part of Debenture holder.

The process of Redressal of Grievance of FD holders will be monitored by the Central Operations Team. The FD holders may send their query or complaint through email to the Company at customercare@aadharhousing.com.

Annexure -B

Grievance Redressal Mechanism related to Shareholders/Investors:

The shareholder may send their query or complaint to the Company Secretary & Compliance Officer of the Company at einward.ris@kfintech.com with a copy marked to complianceofficer@aadharhousing.com. The shareholder shall be responded within a period of 7 days from the date of receipt of query or complaint, to resolve the issue unless there is any legal or technical error on part of share holder.

If query or complaint is not resolved within 7 days	Share holder shall send the query or complaint at complianceofficer@aadharhousing.com
If complaint is not resolved within 30 days, then	Shareholder, can send complaint to Registrar of Companies, Ministry of Corporate Affairs at roc.bangalore@mca.gov.in
