



**Namra Finance Limited**

**CUSTOMER GRIEVANCE  
REDRESSAL POLICY**

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Abbreviation	Meaning
RBI	Reserve Bank of India
KYC	Know Your Customer
RPC	Regional Processing Centre
GRC	Grievance Redressal Cell
TAT	Turnaround Time
IO	Internal Ombudsman
MD	Managing Director
MFIN	Microfinance Institutions Network



## 1. Introduction

A Grievance Redressal Cell (GRC) has been set up at the Head Office, which is responsible for ensuring that all customers' grievances are addressed. While the onus of addressing any customer queries and complaints lies with all employees of Namra Finance Limited, GRC will be responsible for monitoring, tracking & reporting of all grievances received from customers.

## 2. Scope & Responsibility

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The grievance redressal process has been defined to address the grievances of all our customers as well as the general public. Attending to the enquiries and requests of our customers are also included under the scope of GRC. Staff members at all levels and Grievance Redressal Cell (GRC) are duty bound to address the concerns of our customers.

### 2.1. Procedure for raising of grievance

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Channels available for customers to contact Namra Finance Limited for complaints/requests/queries

1. **Toll Free Number:** 1800-102-7626, 079-69162602, 079-40507000 (during working hours)
2. **Email:** nodalofficer@armanindia.com
3. **Written Complaint:**  
Addressed to:  
Principal Nodal Officer  
Namra Finance Limited  
502-503, Sakar-III, Opp. Old High Court,  
Off Ashram Road, Ahmedabad – 380014
4. **Branch Walk-in Complaints:**
  - Complaint Drop Boxes placed at branch premises

All complaints received through the above channels shall be acknowledged and registered in the centralized Grievance Redressal System (GRS).



Grievances that are escalated to or directly reported to Grievance Redressal team at Head Office will be resolved within a TAT of **30** days.

The toll-free number along with the communication address has been printed in **the Loan Card** issued to customers. Details of grievance redressal channels are also published on the company's website as well as displayed on the notice boards at branches and Head Office.

### **2.2 Responsibility for Complaints Relating to Outsourced Services**

Notwithstanding the outsourcing of any activities or services by the Company to third-party service providers, the responsibility for effective grievance redressal shall continue to vest solely with Namra Finance Limited.

The Company shall remain fully accountable for addressing, monitoring, and resolving customer complaints arising out of or in connection with outsourced services, within the stipulated turnaround time, in accordance with applicable regulatory guidelines

Outsourcing of services shall not dilute the Company's obligations towards customers, and all such complaints shall be handled through the Company's Grievance Redressal Cell, including registration, investigation, escalation, and closure.

### **3. Process followed at Grievance Redressal Cell (GRC)**

- i. The toll-free number is accessible during the working hours for grievance redressal and any queries, requests or complaints raised by customers will be documented to provide appropriate resolution.
- ii. When a customer calls the toll-free number, GRC will collect the caller's details and the concerned member details when if our borrower. The ticketing system available for branch queries , which will be used for CGRM related lodging of complain immediately, generate online ticket number and provide acknowledgement to the contact number from which complaint received.
- iii. For complaints received through other channels such as **Nodalofficer@armanindia.com** and written letter to Head Office, GRC team will contact the complainant to get the necessary details verified to raise the ticket in the online GRM.
- iv. For complaints received through the complaint register available at branches, respective branch needs to send details of the complaint including the complainant's contact details to the GRC team in Head Office within 3 working



days of receipt of the complaint. GRC team will ensure that a ticket is raised and will seek necessary details from concerned branch or the complainant for details of the issue.

- v. Post the registration of ticket, additional information about the member/s are obtained by the GRC from the system, branch as well as the concerned department. The case is then diagnosed to determine the root cause of the grievance and further classification/determination of TAT. The turnaround time (TAT) for resolution of customer issues will depend on the nature of the issue raised.
- vi. While registering the ticket, GRC will check if any tickets by the same customer with same subject matter exists in the Grievance Redressal System and is marked closed in the last 15 days. if found, GRC will create a reference to the same by mentioning the previous ticket ID, subject, resolution remarks in the new ticket being created and then continue with the resolution process.
- vii. When an issue is received by concerned department from GRC, they need to respond within 7 working days with the resolution TAT based on the nature of the grievance. If there is no response within 7 working days, GRC team will follow the response TAT escalation matrix to escalate the matter to the next levels.
- viii. The TAT provided by the concerned department will be reviewed by the GRC and then communicated to the customer/complainant.  
*Note: In case of insurance claim related issues where documents are pending from the claimant/Nominee, the TAT will be considered from the date of receipt of all the relevant documents by the Insurance Department.*
- ix. GRC will follow up with the concerned departments for resolution of the grievance within the committed TAT. If any case is not resolved within the above specified TAT, GRC team will follow the response TAT escalation matrix to escalate the matter to the next levels.
- x. Once the case is resolved, the concerned department will interact with the complainant and confirm the resolution based on the consent of the customer. Further, they Communicate regarding the closure to the GRC team. GRC team will once again interact with the complainant/concerned member and take confirmation regarding the resolution of the grievance and on



confirmation of resolution in favor, update the closure on the online GRM. This closure call will be recorded and preserved along with the ticket for future reference.

- xi. If the resolution is not fully/partially in favor of the customer/complainant, the case has to be referred to the Internal Ombudsman (as per the RBI IO scheme guidelines, ANNEXURE-4).
  - a) All such complaints will be examined by the Internal Ombudsman based on records available with Namra Finance Limited including any documents submitted by the complainant, resolution remarks and related documents furnished by the concerned department.
  - b) The Internal Ombudsman may interact with the concerned functionaries/departments and seek any additional record/document available with them in connection with the complaint.
  - c) The Internal Ombudsman may also seek additional information from the customer/complainant through the company.
  - d) In case the Internal Ombudsman disagrees with the resolution provided by the concerned department, he will recommend the revised resolution as per his findings and analysis.
  - e) The concerned department will either implement the recommended resolution or in exceptional cases where the recommendations cannot be complied with, will take approval from the COO and go ahead with the planned resolution. The concerned department will then interact with the complainant and confirm the resolution and based on the consent of the customer, communicate regarding the closure to the GRC team.
  - f) GRC team will once again interact with the complainant/concerned member and communicate regarding the resolution of the grievance and update the closure on the online GRM. This closure call will be recorded and preserved along with the ticket for future reference.
  - g) Based on the above process, one of the below communications will be made during the closure interaction with the customer.
    - i. The case has been examined and upheld by IO.
    - ii. The case has been examined by IO, however the company is



upholding its original resolution overruling the IO's recommendation.

h) The entire process has to be completed within 10 days from the point of escalation to IO and within 30 days from the receipt of the complaint.

i) An SMS will be shared to the contact number received from the complainant confirming the closure of the complaint.

j) Treatment of Multiple / Duplicate Complaints

If multiple complaints are received from the same complainant on the same issue, they shall be linked to the original complaint ticket.

Duplicate complaints received within 15 days of closure shall be:

Tagged as "Duplicate"

Resolved by referencing the original resolution

If a complaint raises new facts or dissatisfaction with earlier resolution, it shall be treated as a fresh complaint with cross-reference to previous ticket(s).

### 3.1 Escalation channel

If the resolution is not provided within 30 days from raising the grievance or if the complainant is not satisfied with the resolution provided to him/her, then he/she can escalate the same to:

#### **1. MFIN Grievance Redressal Cell:**

Grievance Redressal Cell  
Microfinance Institutions Network (MFIN)  
403 - 404, 4th floor,  
Emaar Palms Spring Plaza,  
Golf Course Road, Sector-54  
Gurgaon-122003, Haryana  
MFIN Toll Free: 1800-102-1080

#### **2. RBI - Ombudsman**

3rd Floor, Ram Bagh Circle  
Tonk Road,  
Jaipur - 302004, Rajasthan,  
Tel: 0141-2573201,  
Email: dosjaipur@rbi.org.in  
Web: -<https://cms.rbi.org.in>



### 3.2 Anonymous Calls received at grievance cell.

For anonymous calls received at the toll-free number, the nature of the call will be determined first. In case the call was wrongly addressed to Namra Finance Limited, the case will get noted as a query received incorrectly and closed upfront.

In case the call is of a serious nature where the complainant wishes to remain anonymous and raises a serious complaint either regarding an employee or regarding a service provided by Namra Finance Limited, the nature of the case is recorded in the Grievance Redressal System along with the location of caller, branch (if available) and employee name/nature of service keeping the caller name anonymous.

An investigation will be carried out regarding the call by the grievance cell. If the matter is extremely sensitive & personal in nature, then a field visit by the grievance cell officer or a senior officer from head office or regional office will be arranged to determine the facts of the case first hand. The concerned branch must not be involved in the investigation process.

On completion of the field visit, a report is submitted to the grievance redressal officer as well as COO regarding the facts of the case and recommended steps to resolve the issue. The grievance redressal officer with the approval of COO will take action based on the report.

### 3.3 Random Sample Check by Senior Management on Quarterly basis:

To improve the effectiveness of quality of redressal of complaints, a random check will be performed by any senior official designated by senior management on a quarterly basis. This random sample of at least 20 grievances will be selected by the designated senior official for review. A brief report on this randomized sample check along with observations & recommendations will be published to the GRC team as well as Senior management on quarterly basis.

## **4 Grievance redressal with respect to Credit Information Reports:**

In case of any grievances received pertaining to Credit Information Reports (CIR), GRC team will take up such cases with the internal IT team for verification of the details submitted to all the Credit Information Companies (CICs).

Any grievance pertaining to Credit Information Report will be raised as per the format provided as per Annexure – 4. These details will be captured by the concerned GRC representative who is in contact with the complainant.



The complainant will be advised by the NFL of the action taken on the complaint in all cases, including the cases where the complaint has been rejected as per the details available in NFL records. In cases of rejection, the reasons for rejection will also be provided by NFL.

If the complaint is found to be valid and the complainant's details need to be updated with the CICs, NFL will ensure that the details get updated within 21 days. If the correct details are not updated within 21 days, then NFL will pay compensation to the complainant for delays as per the regulatory guidance on the same. Currently the compensation is set at Rs.100 per day after the 21 days period within which the grievance should have been resolved.

NFL will inform the concerned CIC(s) and the complainant after the final resolution, regarding total delay (in calendar days) and the amount of compensation to be paid by NFL. The compensation amount will be credited to the bank account of the complainant within five (5) working days of the resolution of the complaint.

## **5 Reporting:**

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Reporting GRC will submit the following periodical reports:

1. Monthly Reports on the status on number of grievances received, resolved and pending to Senior Management and MD & COO.
2. Quarterly reports with a detail analysis of grievances received, resolved and pending to the SRC Committee.
3. All complaints pending beyond 3 months will be highlighted to the SRC (Senior Review Committee) committee in the quarterly report.
4. Quarterly Report consisting of 20 grievances resolved during the Quarter under review for Random Sample Check
5. Internal Ombudsman will submit reports on cases referred to him/her and his/her analysis on the overall complaints received by the company to the board on quarterly basis as per the formats prescribed by the board.
6. Internal Ombudsman will also submit reports to the RBI as per the prescribed formats in the intervals defined by the RBI.



## 6. ANNEXURE

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### 6.1. Annexure – 1 – Case type and Category

A. Case Type to be recorded for tracking purposes can be one of the following three:

1. **Query** – is defined as any communication from the customers for the primary purpose of requesting information about Namra Finance Limited and/or its services.

Examples: Clarification on

- i. interest rate offered,
- ii. repayment amount,
- iii. Eligibility for loan etc.
- iv. Credit Information complains

2. **Request** – A "Request" is defined as any communication from a customer to Namra Finance Limited soliciting a service such as a change or modification in the policy.

Examples:

- i. Request for moratorium on her existing loan
- ii. Fresh emergency loan,
- iii. Higher loan amount,
- iv. Personal Loan,
- v. Insurance claim request, etc.

3. **Grievance/Complaint:** A "Grievance/Complaint" is defined as any communication from our customer to Namra Finance Limited that expresses dissatisfaction about an action or lack of action, about the standard of service/deficiency of service of Namra Finance Limited and/or any intermediary or asks for remedial action.

Examples:

- i. Customer raising an issue regarding a request not addressed on time.
- ii. inappropriate behavior by any Namra Finance Limited staff
- iii. Harassment of customer regarding repayment
- iv. non-disbursal of an emergency loan on time, etc.



**Possible complaint categories**

**A. Loan related**

<b>SRN</b>	<b>Application &amp; Processing</b>	<b>Explanation</b>
1.	Products details not informed	Customer complains that she is not given the product details such as loan amount, interest rate, processing fee, insurance premium, repayment frequency, tenure and other conditions etc.
2.	Fee demanded/charged for loan application	Customer complains that a fee is demanded/charged for loan application by loan officer or Centre leader etc.
3.	Loan application not taken	Customer complains that loan officer is not taking the application for loan
4.	Acknowledgement not given for loan application submitted	Customer complains that she has not received acknowledgment for the loan application she has Submitted
5.	Status of loan application not informed	Customer complains that she is not getting informed about the status of her loan application submitted
6.	Delay in Processing / sanctioning of loan after loan application has been submitted	Customer complains that there is delay in her loan processing after submission of application
7.	Loan rejected, and reasons not disclosed	Customer complains that her loan application is rejected but reasons not given by the company
8.	Loan rejected but customer contesting the reasons given for rejection	Customer complaints that reasons given by the company for rejecting her loan application are not correct or right
9.	Loan approved / sanctioned but disbursement not received	Customer complains that her loan is approved / sanctioned but disbursement is not received
10.	Disbursement amount received is less/more than sanctioned amount	Customer complains that she has received disbursement (either in cash or cash-less) less or more than sanctioned amount.
11.	Disbursement not credited in bank account	Customer complains that disbursement amount is not credited in her bank account
12.	Loan agreement not given	Customer complains that she has not received the loan agreement
13.	Loan agreement does not include key details like interest rates, processing fee, insurance premium,	Customer complains that copy of her loan agreement does not include key details like interest rates, processing fee, insurance premium, loan amount, tenure, repayment frequency, CGRM etc.



	loan amount, tenure, repayment frequency, CGRM etc.	
<b>14.</b>	Loan card not given	Customer complains that she has not received the loan card
<b>15.</b>	Loan card does not include key details	Customer complains that copy of her loan card does not include key details like interest rates, processing fee, insurance premium, loan amount, tenure, repayment frequency, CGRM etc.
<b>16.</b>	Loan sanctioned/ disbursed without customer's consent	Customer complains that the loan has been disbursed to her without her informed consent
<b>17.</b>	Repayments done not acknowledged / updated	Customer complains that repayments done by her are not updated in the loan card or she has not received the receipt
<b>18.</b>	Penalty demanded / charged for delayed repayment	Customer complains that she is demanded / charge penalty amount for delayed repayment
<b>19.</b>	Repayment demanded / collected before due date	Customer complains that advance repayment (before the due date) is demanded or collected
<b>20.</b>	Penalty charged for absence from Centre meeting	Customer complains that she is demanded /charged penalty fee for absence from the centre meeting
<b>21.</b>	Pre-closure not allowed	Customer complains that she is not permitted to pre- close the loan
<b>22.</b>	Penalty demanded / charged for pre-closure	Customer complains that she is demanded/charged penalty amount for pre-closure
<b>23.</b>	Forced for pre-closure	Customer complains that she is forced to pre-close the loan
<b>24.</b>	Final Discharge / acknowledgement for closure	Customer complains that she is not given final discharge/acknowledgement for closure of loan
<b>25.</b>	Subjected to indecent/abusive behavior	Customer complains that she is being subjected to indecent and abusive behaviour or language
<b>26.</b>	Home visit in late hours	Customer home is visited in late hours for application / documents / repayment / attendance etc.
<b>27.</b>	Staff not coming or coming late	Customer complains that staff does not come or comes late from agreed time given to her
<b>28.</b>	Un-authorized collection of charges	Customer complains that she is demanded /charged un-authorized fee (other than processing fee, interest premium, scheduled repayment
<b>29.</b>	Dispute with Credit Information Report (CIR)	Customer complains that her records in Credit Information Report (CIR) is not correct



30.	Breach of personal data	Customer complains that her data has been shared externally with third parties without her consent
31.	Misuse of KYC	Customer complains that her KYC documents/IDs have been misused
32.	Subjected to discrimination	Customer complains that she is discriminated on account of her ethnicity, gender, age, disability, political affiliation, sexual orientation, caste, and religion
33.	Not informed of terms and condition	Customer complains that she is not informed about terms and condition associated with loan
34.	Behaviors of group members/Centre leader	Customer complains about other behavior of other group members or Centre leader
35.	Complaint is not registered	Customer complains that her complaint is not registered or taken

**B. Credit Linked Life Insurance**

36.	Details of insurance coverage not provided	Customer complains that she is not informed about the insurance coverage
37.	Receipt of premium amount not given	Customer complains that she is given any receipt for the premium paid for insurance (either in loan card, loan agreement or other receipts)
38.	Repayment not stopped after death of insured person	Customer complains that repayment is not stopped after the death of insured person (either customer or her spouse or relative who was insured)
39.	Documents for insurance claim not collected	Customer complains that she is not getting support for documents to be collected for claim settlement
40.	Insurance claim not received after submission of the documents	Customer complains that she has not received the claim amount after submission of the relevant documents
41.	Insurance claim received is less/more than her principal loan amount outstanding at date of death	Customer complains that claim amount received is less/more than her principal loan amount outstanding at date of death
42.	Repayment collected after death has not be refunded	Customer complains that repayment collected after date of death has not been refunded
43.	Insurance amount is withheld	customer complains that she is being asked to settle outstanding amount before she is provided with the claim amount/cheque
44.	issues with claim cheque	customer complains either of a) outdated cheque being given to customer, b) cheque with wrong customer/nominee/ account



	details given to customer
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**C. Third-party/cross-sell products**

45.	Customer forced to buy third-party/cross-sell product	Customer complains that she is forced to buy a third- party/cross-sell product
46.	Customer not informed about charges of third- party / cross-sell product	Customer complains that she is not informed about the cost/charges of third-party/cross-sell product
47.	Customer not Informed / mis-informed about product features	Customer complains that she is not informed or mis- informed about features of third-party/cross-sell product
48.	Receipts/ documents not provided for purchased product	Customer complains that she is not given receipt/document for the purchased third-party/cross-sell product
49.	Delay in delivery of product	customer complains that she has purchased/ taken loan for the product, but the product has not been delivered to her
50.	Product quality issues	Customer is not getting support for defects in third- party/cross-sell product
51.	Product servicing issues	Customer is not getting support for servicing of third- party/cross-sell product
52.	Others	

6.2 Annexure-2 – Grievance Tracker Format

6.4 Annexure – 3: Format for submission of Complaint

Complainant is requested to furnish copies of

- (1) Fully downloaded Credit Bureau Report in PDF Format and
- (2) KYC Documents such as Voter ID Card, Ration Card, Aadhar Card and PAN Card.

Sr.No	Name of member	Member ID	Ref. No	Center Name	Contact Number	Branch Name	Case Type	Category	Date of raising Issue	Description of the issue(s)	Responsibility	Resolution remarks	Case Status	Date of Resolution	Source



Namra Finance Limited

Sr No	Particulars	Response by Complainant
1	Name of the Complainant	
2	Contact Number	
3	Name of the Member whose CB Report needs correction	
4	Address of the Complainant	
5	Email id	
6	Details of grievance	
7	Details of Bank Account	
	a) Name of the Account Holder	
	b) Bank Account Number	
	c) Name of the Bank	
	d) Name of the Branch	
	e) IFSC Code	
8	UPI ID of the CB Report Holder	

Please note that CAGL will not be responsible for any incorrect information furnished above.

Date:

Place:

Signature of the Complainant

**6.5 Annexure-4 : Format to a record complaint in the Complaint Register at branch**

Date (Grievance Redressal Day)	Member ID	Name of the Member/ Complainant	Complainant's contact Number	Details of Grievance	Resolution Level; Branch/HO	Date of submission of statement to HO