



BELSTAR MICROFINANCE LIMITED

**CUSTOMER GRIEVANCES REDRESSAL
MECHANISM (CGRM) POLICY**

@Reviewed by The Board of Director On 28th January 2020

Contents

1.Introduction:.....	1
2. Objectives:.....	1
3. Underlying Principles:	1
4. Main Reasons for client’s Complaints /Grievances	2
5. Framework:.....	2
6. Commencement & Review:.....	11
ANNEXURE- I.....	11
ANNEXURE- II.....	12
ANNEXURE-III.....	13
ANNEXURE-IV.....	13
ANNEXURE-V.....	14

1.Introduction:

Belstar Microfinance Ltd. (BML), through its credit and credit-plus support services, aims to financially empower unserved and underserved women and help them build and manage their sustainable livelihoods. BIFPL believes that customer is the central point of its activities and providing efficient customer service is essential not only to increase its outreach to newer clients, but also to retain existing clients for sustained business growth. Customer has the right to be heard. Customer complaints constitute an important *Voice of Customer*. Customer Grievance Redressal Mechanism (CGRM) is recognized as an important tool to make a stronger connect with customers to address their queries, concerns and complaints and get insights into their needs, requirements and expectations. This, inter alia, will help BIFPL to improve its processes, services and internal controls.

The Fair Practice Code of RBI, as outlined in its Master Direction-NBFC-Systemically Important Non-Deposit taking Company and Deposit taking Company- PD.008 / 03.10.119 / 2016-17 dt 01-09-2016 (updated as on 31.05.2018), mandates the Board of the Company to lay down an appropriate grievance redressal mechanism within the organization and to review its functioning periodically. Vide its email dt 15th October 2018, Micro Finance Institutions Network (MFIN) has also provided a guidance note on Customer Grievance Redressal Mechanism (CGRM).

2. Objectives:

The basic objective of the CGRM is to put in place a convenient, simple, transparent and effective system for speedy and efficient resolution of individual customer complaints and minimise instances of customer dissatisfactions. Additionally, it envisions (i) to protect customers against fraud or other unethical practices by educating them about the alternative escalation mechanisms within and outside the Company, for resolution of their issues if they are not satisfied with the Company's response; (iii) to consistently assess the impact of services in order to enhance competencies and serve clients better and (iv) to orient employees for consistently superior service behaviour.

3. Underlying Principles:

This CGRM policy is based on the client protection principles that (i) the Company will treat all the complaints efficiently and fairly as they can otherwise damage the Company's reputation; (ii) Complaints raised by the clients must be dealt with courtesy and in time; (iii) All clients are fully informed of the avenues

to escalate their complaints and (iv) the employees will work in good faith and without prejudice to the interests of the client.

4. Main Reasons for client's Complaints /Grievances

(i) **Employee Attitude related-** Such complaints be handled courteously, sympathetically and above all swiftly. Undesirable behaviour with customers be treated at zero tolerance level and immediate action is to be taken. It is to be emphasised that an open mind and a smile on the face of our employees will be able to win the customer's confidence and sort out many a complaint.

(ii) **Transactions / Operations related-** Such complaints arise due to inadequacy, at times, of the services made available to the clients or gaps in standards of services planned by the Company as per internal process and actual services rendered. Primarily Branch is responsible for the resolution of complaints/grievances relating to transactions / operations. Branch would be responsible for ensuring rectification of entry / transaction or satisfaction of customers. In case, it is not getting resolved at branch level, they can refer the case to Grievance Redressal Officer (GRO) at Head Office for guidance/resolution. It is the foremost duty of the branch to see that the complaint is resolved to the customer's satisfaction and if he/she is not satisfied, then to provide him/her with alternative avenues to escalate the issue.

5. Framework:

This CGRM Policy framework broadly consists of the following:

5.1. Employee Orientation:

Since customers greatly rely on field level employees to make use of our CGRM, the company will take steps to ensure that employees are sensitized about supporting the customers on different issues which customers might face and hence, should be equipped with adequate information about CGRM. Components of CGRM and assessment of employee's knowledge on CGRM shall be included in the employees training modules (induction or refresher) to ensure that they shall be made broadly aware of the CGRM policy, responsibilities of different employees thereunder and acceptable Turn Around time (TAT) to resolve the various types of complaints. Parameters on CGRM will also be factored in the employee's performance appraisal which will ensure that employees have incentives to handle the customer issues with utmost care and as per the Company policy.

5.2. Customer Facilitation-

Customer facilitation on CGRM through the following aspects is to ensure that customer knows and trusts CGRM of the Company and has fair and easy access to it.

5.2.1. Multiple channels-

Customers will be provided with multiple channels to access to CGRM such as – complaints/suggestion drop-box at all our branches/ offices, Company’s email addresses / Toll-Free No / landline numbers / postal addresses, MFIN Toll Free No and contact address of Regional Office of RBI.

5.2.2. Training –

Periodically, customers’ understanding of the CGRM will be assessed and they will be made aware of our CGRM in group meetings, in SHG/JLG orientation trainings, etc. The awareness about the CGRM shall be imparted throughout the customer life cycle.

5.2.3. Displays and Disclosure-

The repeated displays and disclosures should serve the purpose of highlighting to the customers, the grievance redressal mechanism followed by the Company, together with details of the Company’s Toll-Free No and Grievance Redressal Officer (GRO), Toll-Free No of MFIN and contact details of the Regional office of RBI. Hence, apart from oral disclosures (through trainings, employee interactions etc) and other company-level disclosures required by the law or other regulatory provisions like Annual Financial Report etc, the Company will disclose/display the following.

5.2.3.1. In Company’s Website

i	Fair Practices Code (FPC) of the Company which is aligned with RBI's FPC.
ii	The effective rate of interest charged.
iii	Customer Grievance Redressal Mechanism (CGRM) of the company including (i) Channels available to customers at the Company level to register complaints, (ii) Escalation process including complaints to MFIN and RBI, (iii) Expected Turn Around time at every level of escalation, (iv) Toll-Free number of the Company, (v) Name and Contact details of Company's Grievance Redressal Officer at HO, (vi) MFIN Toll-Free number to escalate complaints, and (vii) Contact details of DNBS, Regional RBI Office (where Company is registered) to escalate complaints.

iv	Details of all loan products offered under annualised interest rate, on a reducing balance basis, processing fees, tenure, repayment frequency, purpose etc.
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5.2.3.2. In Company's Branch / Regional / Head Office-

The disclosure / display will include the following in addition to the ones stated above for website.

i	Declaration that the company will be accountable for preventing inappropriate employee behaviour and timely grievance redressal.
ii	Commitment to transparency and fair lending practices.
iii	Client Protection Code in English and the local language.
iv	Pricing of loan involves only three components viz; interest charge, processing charge and insurance premium (which includes administrative charges in respect thereof).

5.2.3.3. In Loan Application

i	Necessary information which affects the interest of the borrower, so that a meaningful comparison with the terms and conditions offered by other MFIs can be made and informed decision can be taken by the borrower.
ii	Documents required to be submitted with the application form including list of KYC documents to be submitted by customers.
iii	Acknowledgement for receipt of all loan applications including the time frame within which loan applications will be disposed of. Also mention the Toll-Free No of the Company.
iv	Details of all loan products offered under annualised interest rate, on a reducing balance basis, processing fees, tenure, repayment frequency, purpose etc.
v	Consent to check customer's credit data with Credit Information Companies (CICs).

5.2.3.4. In Loan Agreement

i	Amount of loan sanctioned, annualised rate of interest on a reducing balance basis and all the terms and conditions of the loan.
ii	Give notice to the borrower in the vernacular language of any change in the terms and conditions including disbursement schedule, interest rates, service charges, prepayment charges etc. A suitable condition that changes in interest rates and charges are affected only prospectively.

iii	Pricing of the loan involves only three components viz; the interest charge, the processing charge and the insurance premium (which includes the administrative charges in respect thereof).
iv	There will be no penalty charged on delayed payment and no security deposit / margin is being collected from the borrower.
v	Borrower cannot be a member of more than one SHG / JLG.
vi	The moratorium period between the grant of the loan and the due date of the repayment of the first instalment (as per RBI's Master Directions).
vii	Privacy of customer data will be respected and that no customer data will be shared with any third party without taking customer's consent unless required by regulations.
viii	Company is accountable for preventing inappropriate employee behaviour and timely grievance redressal.
ix	Commitment to transparency and fair lending practices as per RBI.

5.2.3.5. In Loan Card

i	Commitment to transparency and fair lending practices as per RBI.
ii	The effective rate of interest charged and all the major terms and conditions of the loan.
iii	Information which adequately identifies the borrower.
iv	Acknowledgement of all repayments including instalments received and the final discharge.
v	Non-credit products issued shall be with full consent of the borrowers and fee structure shall be communicated in the loan card itself.
vi	No security deposit / margin/ other charges are collected from the customer by itself or by third parties as a condition to avail the loan.
vii	Grant of loan is not linked to any other product /services offered by the Company or a Company identified third party.
viii	Pricing of the loan involves only three components viz; the interest charge, the processing charge and the insurance premium (which includes the administrative charges in respect thereof).
ix	No penalty is charged on delayed payment.
x	Prominently mention the grievance redressal system set up by the Company, its Toll-Free No and the name/contact details of its Grievance Redressal Officer and the Branch Manager and Regional Manager.
xi	MFIN Toll-Free No and contact details of DNBS, Regional RBI Office (where company is registered)to escalate complaints.

5.2.4. Proactive outreach to customers:

Given the educational and socio-economic background of Company's customers, it is likely that they may not reach out to our CGRM for a variety of reasons including hesitation, poor recall and mistrust etc. Therefore, Company shall take proactive steps to facilitate the customers to access the Company's CGRM by reaching out to them to get their feedback on various aspects like products/services offered, processes followed, employee behaviour etc. through customers-survey-questionnaire or feedback-rating in tab/mobile applications and during field visits by higher officials.

5.2.5. Complaint Escalation-

BIFPL is committed to observing fair practices in all its business transactions and dealings with customers with utmost transparency and ethical standards. In case of any complaints /grievances the customers can make use of the following Grievances Redressal Mechanism set up by the Company, within the organisation as per escalation matrix mentioned below:

Level 1: In case of a grievance, the customer can approach the Branch Manager (BM) or Regional Manager (RM) and discuss the complaint/grievance issue. The contact number of the BM and RM are mentioned in the Loan Card and displayed in the branch. The BM / RM shall resolve the complaint/grievance within 5 working days from the date of receipt of the complaint.

Level 2: If the customer is not satisfied with the response received at the branch level or does not receive a response, customer can call the Belstar Toll-Free customer care no. 1800 102 7049 or at Head office (044- 45544026). The complaint will be handled as per guidelines in this policy and grievance will be redressed within 5 working days from the date of receipt of the complaint at the Toll-Free no. / HO landline.

Level 3: In case, the issue is not resolved within 10 working days of complaint either by lodging at the branch or at the toll-free no./ HO landline, the complaint can write or contact:

Mr. Banabihari Panda

Grievances Redressal officer (GRO)

Belstar Investment and Finance Private limited

New no. 33, old no . 14 , 48th street, 9th Avenue,

Ashok Nagar, Chennai – 600 083. Tel no. 044-43414569

Email ID : banabihari.p@belstar.in

Customer shall receive an acknowledgement within 2 working days from the date of receipt of complaint. The complaint will be handled as per guidelines in this policy and the grievances will be resolved within 15 working days from the date of receipt of the issue/complaint matter by the GRO if it involves only the Company or within 30 days if the complaint involves an external agency.

Level 4: If a customer is not satisfied with the response received from GRO or Branch or does not receive any response from GRO or branch within 15 /30 working days, the customer can contact Microfinance Institutions Network (MFIN) in writing or make a phone call to their Toll-Free number- 1800 270 0317.

Level 5: If customer is not satisfied with the response received or does not receive any response from Branch / GRO within 30 working days from the date of complaint, customer may call or write to the following officer of RBI:

General Manager

Department of Non-Banking supervision (DNBS),

Reserve Bank of India,

Fort Glacis, Rajaji Salai, Chennai – 600 001.

Ph no. 044-25393406, Fax no. 044-25393797, Email D: dnbschennai@rbi.org.in

5.3. Governance Structure:

5.3.1. At Branch / Regional Level:

Branches are the first level of customer interactions. The Branch Accountant (BA) will be the branch-level Nodal Officer for Customer Grievance Redressal. The BA will *proactively assist the customers* who wish to submit their complaints / suggestions in the drop-box provided in the respective branch and record the same in a serially numbered Complaint Book (with duplicate perforated copies as per format in *Annexure-I*) available with the BA who will hand over to the complainant then and there a copy of the serially numbered complaint as an acknowledgement. The keys of the drop-box for complaints / suggestions in a branch will be available with the BA. This box will have glass frontage so that any sheet of paper with complaint / suggestion inside the box can be seen from outside and retrieved by the BA at the end of the day. The BA will open the drop-box at the end of the day and record the complaint / suggestion received, in the Complaint Book even if the complainant is not there to sign the complaint. The Branch Manager (BM) will record the complaints in the branch level Complaint Disposal Register as per format in *Annexure-II*. BM will peruse the complaint, initiate resolution, if possible at his / her end, email brief detail of the complaint

to RM / CM under copy to Grievance Redressal Officer (GRO) at HO in email id customercomplaint@belstar.in within three working days of the complaint. If resolved, the BM will inform the complainant (within 5 working days of the complaint) about the resolution and email the same immediately to RM / CM and Grievance Redressal Officer (GRO), HO. If not resolved at his / her end, the BM will pursue with RM / GRO, HO for resolution of the same. Each BM will submit as per format in *Annexure-III*, to RM a monthly statement, within the first-week of the succeeding month, of customer complaint resolution status stating the no of complaints registered during a month, no of complaints closed, no of complaints open (along with details of open complaints as per branch complaint register). The RM will consolidate branch-wise complaints and submit a monthly report within the second-week of the succeeding month to the GRO at HO in email id customercomplaint@belstar.in as per format in *Annexure-V*.

There will be a branch level Customer Service Committee (CSC) consisting of the Branch Manager, Branch Accountant and at least three clients from each cluster of the branch which shall be convened once in a quarter. It will be held in the branch premises on a date convenient to all the members of the committee which shall be decided at least two weeks in advance. It is desirable that the RM or CM also attends this meeting as an invitee. During this meeting, discussions shall be held regarding complaints / suggestions received from customers, steps taken to resolve the same and other related matters. The minutes of the meeting will be recorded as per the format in *Annexure-IV* and copy submitted to the RM within one week of the meeting. The RM will submit a consolidated report on the quarterly CSC meetings of all branches under his / her control and send the same to GRO, Head Office (HO) within 10 days of end of each quarter as per the format in *Annexure-V*. Separate monthly reporting by BM / RM is not needed for the month when the quarterly CSC meeting is held / reported.

5.3.2. At HO Level:

There will be a Grievance Redressal Committee (GRC) at Head Office. This committee will meet at least once in a month and will be chaired by the Managing Director. The Grievance Redressal Officer at HO will be the convenor-member of this committee. The Vice-President, Business Head, Head-JLG, Heads of Accounts, IT, Audit and HR departments or their representatives will be the other members. There will be at least one-woman member in this committee. The Convenor will submit to the committee the detailed analysis of the individual complaints processed during the month/quarter. A statement consolidating BMs' monthly reporting to RMs / branch level quarterly customer

service committees shall also be placed to the committee. The committee will (i) evaluate complaints received channel-wise / category-wise and the redressal process during last month / quarter; (ii) peruse the CGRM audit report, if any, and feedback on the quality of customer service received from various quarters; (iii) ensure that all regulatory guidelines regarding customer service are adhered to; (iv) review the initiatives and measures taken by the Company for improving customer service. The summary of the minutes of the committee will be placed to the Board every quarter.

5.3.3. At Board Level:

The Board of the Company will examine issues having a bearing on the quality of customer service rendered. Board will also review the report and functioning of the Grievance Redressal Committee at HO and Customer Service Committees at Branches and operation of the Company's Customer Grievance Redressals Mechanism (CGRM) during the last quarter.

5.4. Complaints Processing:

An effective and efficient complaint processing system with the following steps ensures that customer complaints are resolved timely as per Company's policy and to the customers' satisfaction.

5.4.1. Registration of the complaints and acknowledgement:

The Grievance Redressal Officer(GRO) at HO will ensure that customer complaints are centrally recorded at HO, channel-wise in excel format, capturing date of complaint, complaint serial registration no, customers details (name, identification number, address, mobile/phone no), category of complaint, brief details of the complaint, official to whom it is assigned for resolution, action taken, status of complaint, date of calling back the complainant to know whether he/she was satisfied with the resolution and her feedback, date of closure, actual turnaround time (TAT), appeal by the customer, if any etc. As soon as it is registered, the customer should be given an acknowledgment with the complaint serial registration no as the reference number along with expected timeframe within which the complaint will be resolved. Additionally, the employee registering the complaint will provide the complainant details of next escalation level available in case the complaint is not resolved to the satisfaction of the complainant.

5.4.2. Categorization of complaints and Tracking of resolution status:

To synchronise Company's quarterly SRO reporting on CGRM to MFIN, all in-bound calls / communications are broadly categorised into (A1) Queries, (A2) Service Requests and (A3) Complaints. Complaints are further categorised into (B1) Interest Rates, (B2) Excessive Charges, (B3) Insurance Claim Settlements, (B4) Recovery Practices, (B5) Mis-selling or Forced selling of Third Party products, (B6) Digital Transactions, (B7) Updation of Repayment Records, (B8) Updation / Dispute on data in Credit Information Report CIR), (B9) Fraud by Employees, (B10) Fraud by External Agencies and (B11) Others as stated in *Annexure-VI*. Against each of these in-bound calls/communications, the designation of the official concerned to whom it is to be escalated for resolution is stated. The Board approved internal benchmark of Turn Around Time (TAT) in no of days are also set. Each complaint is also assigned a serial complaint number in the master complaint disposal register at HO for easy tracking of resolution status.

5.4.3. Capturing customer feedback and Closure of Complaint:

After a complaint has been resolved by the official concerned, CGRM team will call back the customer to take his / her feedback and satisfaction with the resolution and then close the complaint. If the complainant is not satisfied with the resolution, the GRO at HO will relook into the issue and record his comments in each case which will be communicated to the complainant again. In case customer is still not satisfied, the escalation of the customer complaint will be facilitated.

5.5. Complaint Monitoring and Reporting:

Monitoring and Reporting have three parts, namely analysis, audit and reporting. A proactive monitoring mechanism also acts as an early warning mechanism to identify and address any emerging issue that may warrant quick redressal.

5.5.1. Analysis:

The Grievance Redressal Officer (GRO) at HO is responsible to aggregate data of all the complaints received through different channels and analyse them for trends based on nature / cause of complaints, origin (branch, location), product, category etc. Analysis of customer complaints can give rich information about the operational gaps, reasons of customer dissatisfaction and awareness level about Company's CGRM amongst the customers / employees.

5.5.2. Audit:

To improve efficacy of the CGRM, the company will have periodic audit of the CGRM. Such audit will cover all elements related to CGRM such as adherence to policy, employee awareness of CGRM, customer's orientation on CGRM (trainings, disclosure, awareness) and processing of complaints. In processing of complaints, audit should check if all complaints are appropriately registered, handled and resolved, adherence to TAT, degree of satisfaction with the resolution provided as reported by customers and flag the lapses.

5.5.3. Reporting:

The Grievance Redressal Officer (GRO) at HO will place the above said analysis to the Grievances Redressal Committee (GRC) at HO. The GRC will examine the analysis and CGRM audit report, if any, and report every quarter to the Board of the Company to review. The Board will review the CGRM analysis and audit reports and based on this information will consider providing necessary directions as required.

6. Commencement & Review:

This policy will come into effect immediately and the Board will review the CGRM Policy on an annual basis.

Branch _____

Complaint Book

Annexure-1

Complainant's Details

Name:

Member ID:

Group

Name:

Cluster Name:

Village Name:

District:

Brief Details of the Complaint

Date:

Signature of Complainant

Acknowledgement to Complainant (to be issued immediately on receipt of complaint)

Received the above complaint. The expected resolution time is ____ days.

Branch:

Date:

Signature of BA/BM

BM's Report (report to be sent on registering of complaint)

This complaint has been emailed to HO email ID- customercomplaint@belstar.in . We are looking into the complaint for resolution at Branch level.

OR

This complaint has been reported to _____ Office/Dept vide ticket number _____ date _____ and copy marked to HO email ID customercomplaint@belstar.in .

Branch:

Date:

Signature of BM

BM's Complaint Resolution Report

(to be recorded below and emailed to customercomplaint@belstar.in on redressal of complaint)

Branch:

Date:

Signature of BM

ANNEXURE- II

FORMAT OF COMPLAINT DISPOSAL REGISTER AT BRANCH & HEAD OFFICE

Complaint no	Date of complaint	Customer name	Customer ID - no.	Customer address
1	2	3	4	5

Customer contact no	Category of complaint	Brief Details of complaint	Action taken	Status of complaint
6	7	8	9	10

Date of out bound call informing the customer about the resolution	Is the customer satisfied with our redressal decision	Date of complaint closure	Actual Turnaround time	Further appeal by customer, if any.
11	12	13	14	15

ANNEXURE-III

Monthly Complaint Resolution Status report of Branch to RM

FOR THE MONTH OF _____

Branch Name: _____ Region: _____

1. No of complaints outstanding unresolved at the beginning of the month _____
2. No of complaints registered during the month _____
3. No of complaints closed during the month _____
4. No of complaints open/unresolved at the end of the month _____

(along with details of open complaints as per branch complaint register)

➤ 15 days	➤ 30 days	➤ 45 days

Branch Accountant

Branch Manager

ANNEXURE-IV

Minutes of Branch level Quarterly Customer Service Committee Meeting

FOR THE QUARTER ENDED _____ Date of Meeting: _____

Branch Name: _____ Region: _____

Names & Designation of Belstar Officials/ Names of Cluster of Members Present:

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____
11. _____
12. _____

1. No of complaints outstanding unresolved at the beginning of the month _____

2. No of complaints registered during the month _____

3. No of complaints closed during the month _____

4. No of complaints open/unresolved at the end of the month _____

(along with details of open complaints as per branch complaint register)

➤ 15 days		➤ 30 days		➤ 45 days	

5. Brief report on the other related discussion:

Date: _____

Branch Accountant

Branch Manager

ANNEXURE-V

RM's consolidated Report on Quarterly Customer Service Committee Meeting

FOR THE QUARTER ENDED _____ Region: _____

No of Branches in the Region _____, No of Branches CSC Meetings held _____

1. No of complaints outstanding unresolved at the beginning of the Qtr _____
2. No of complaints registered during the Quarter _____
3. No of complaints closed during the Quarter _____
4. No of complaints open/unresolved at the end of the Quarter _____
(along with details of open complaints as per branch complaint register)

➤ 15 days		➤ 30 days		➤ 45 days	

5.

Name of Branch	Brief report on the other related discussion	Observations of RM

6. Reasons for any branch not conducting the Quarterly CSC meeting, if any, and the action taken thereon:

Date: _____

Regional Manager

Internal Escalation and Turn Around Time

ANNEXURE-VI

Sl No	Category of in-bound calls / communications	Official to whom it is to be escalated for resolution	Internal Bench- mark TAT (No of Days)
A1	Queries	BM/HOD of HO Concerned	3 days

A2	Service Requests	BM/HOD of HO Concerned	15 days
A3	Complaints	BM/HOD of HO Concerned	15 days
B1	Interest Rates	HOD of HO Concerned	15 days
B2	Excessive Charges	HOD of HO Concerned	15 days
B3	Insurance Claim Settlements	BM/HOD of HO Concerned	30 days
B4	Recovery Practices	BM/HOD of HO Concerned	15 days
B5	Mis-selling or Forced selling of Third-Party products	BM/HOD of HO Concerned	15 days
B6	Digital Transactions	BM/HOD of HO Concerned	15 days
B7	Updation of Repayment Records	BM/HOD of HO Concerned	15 days
B8	Updation / Dispute on data in Credit Information Report (CIR)	IT Dept at HO	30 days
B9	Fraud by Employees	RM/CM / Business Head	15 days
B10	Fraud by External Agencies	RM/CM / Business Head	30 days
B11	Others	Depending upon the type	15 days
