

GRIEVANCE REDRESSAL POLICY OF CREDFLOW TECHNOLOGIES PRIVATE LIMITED

Authority	Details
Scope	This Grievance Redressal Policy sets out the grievance redressal mechanism of Credflow Technologies Private Limited
Drafted by	Legal and Compliance Department
Approved by	Board of Directors

Version History

Version No.	Approved By	Approved On
1	Board of Directors	06-03-2025

TABLE OF CONTENTS

1. Definitions
 2. Background
 3. Objective
 4. Overview
 5. Principles
 6. Team Sensitization on Handling Complaints
 7. Manner of Registering Complaints – For Customer
 8. Time Estimates
 9. Board Approval
 10. Periodicity of Review
 11. Amendments
 12. Publication
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DEFINITIONS AND INTERPRETATION

1. Definitions

- **“Applicable Laws”** means all applicable laws, statutes, enactments, acts of central or state legislature, ordinances, rules, regulations, notifications, guidelines, directions, directives, policies, circulars, decisions and any other pronouncements issued in accordance with the Companies Act, or any other law applicable to the jurisdiction of India by any central, state,

local, or other governmental, administrative or regulatory authority exercising executive, legislative, judicial, regulatory or administrative functions of or pertaining to the government.

- **“Board”** means the board of directors of Credflow Technosoft Private Limited.
 - **“Companies Act”** means the Companies Act, 2013, and related regulations as amended from time to time.
 - **“Customer”** means a user of the financial services and products, including lending, provided by Credflow Technosoft Private Limited through its Lending Partners.
 - **“Grievance”** means any complaint, dispute, or disagreement by a Customer arising from or relating to the services and products provided by Credflow Technosoft Private Limited.
 - **“Grievance Redressal Mechanism”** refers to the internal grievance redressal mechanism established by Credflow Technosoft Private Limited to address customer complaints.
 - **“Grievance Redressal Policy”** means this grievance redressal policy adopted and implemented by Credflow Technosoft Private Limited, as may be amended from time to time.
 - **“Lending Partner(s)”** refers to the NBFC/bank/financial institution providing the sanctioned loan amount to the end-user.
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INTRODUCTION

2. Background

1.1. Credflow Technosoft Private Limited is a private limited company Credflow Technosoft Private Limited engaged, amongst others, in providing sourcing, referral, collection, and life cycle management services for personal loan products offered by its Lending Partner(s). from time to time.

1.2. For the convenience of the Customers using Credflow Technosoft Private Limited mobile application, and to offer optimum support, Credflow Technosoft Private Limited has set up a Grievance Redressal Mechanism for addressing Customer complaints and grievances through a proper channelized approach, including a review mechanism to promptly redress all Customer grievances.

3. Objective

Objectives of this Grievance Redressal Policy are to:

3.1.1. treat all Customers fairly and consistently and conduct operations in accordance with prevailing industry standards and regulatory/statutory requirements; and

3.1.2. make Credflow Technosoft Private Limited redressal channels effective and meaningful by putting in place a structured system to ensure that Customer complaints are redressed seamlessly and well within the committed timeframe.

4. Overview

This Grievance Redressal Policy is divided into the following parts:

Part 1 (Grievance Redressal Mechanism) describes the Grievance Redressal Mechanism adopted by Credflow Technosoft Private Limited.

Part 2A (Registration of Complaints – PL Customer) provides a framework for registration and handling of Customer complaints;

Part 3 (Time Estimate) provides a time estimate for handling and resolution of Customer complaints.

Part 4 (Review and Oversight) sets out the general terms and conditions, and procedural aspects

PART 1: GRIEVANCE REDRESSAL MECHANISM

5. Principles

The principles governing the Grievance Redressal Mechanism include:

- Establishing a robust grievance redressal framework.
- Constantly improving grievance-handling mechanisms.
- Ensuring employees act in good faith and prioritize customer interests.
- Prioritizing grievances from customers with disabilities.
- Addressing grievances related to outsourced services.
- Ensuring timely, efficient, and fair resolution of grievances.
- Keeping customers informed about grievance resolution processes.
- Incorporating customer feedback into service improvements.

6. Team Sensitization on Handling Complaints

6.1 Grievance Redressal Officer (GRO)

- **Appointment:** Credflow Technosoft Private Limited shall appoint a GRO.
- **Role:** The GRO is responsible for handling customer grievances.
- **Training:** The grievance-handling team undergoes training to ensure effective and empathetic complaint resolution.

PART 2: REGISTRATION OF COMPLAINTS

7. Manner of Registering Complaints

A Customer can register Grievances in accordance with the process set out in this Grievance Redressal Policy. Credflow Technosoft Private Limited follows a 'three level' process for registering and addressing all Grievances as described below.

7.1. Level 1 – Customer Service Team

7.1.1. Approach

A Customer can approach Credflow Technosoft Private Limited by writing an email to the support team that is **support@credflowcapital.com** or from the "Contact us" form available on the website FAQ from the date he/she has applied for a loan from the Credflow Technosoft Private Limited

7.1.2. Acknowledgement

7.1.2.1. All Grievances received in the manner set out in paragraph

7.1.1 above (i.e., by e-mail or through the online website/App complaint mechanism) are acknowledged by a system generated response or via individual emails (to the extent possible).

7.1.2.2. The Customer will be given a ticket bearing a reference number for all future communication around the complaint. The aspects relating to quoting the ticket number in future communications is provided below.

7.1.2.3. The customer support team initiates action on the Grievance and where necessary contacts the Customer for any additional details as may be necessary to address the Grievance.

7.1.2.4. The Customers are kept informed of the action taken, the progress while redressing grievances, and/or, the reasons for delay if any, in redressing any Grievance.

7.1.2.5. The Customers are informed via e-mail the follow up action and the turnaround times for complaint resolution.

7.1.3. Resolution

- 7.1.3.1. All Grievances received are resolved within the timelines set out in paragraph 9 below.
- 7.1.3.2. In case any Grievance takes more than the specified resolution time, the Customers are:
- (i) intimidated; accordingly, and
 - (ii) kept updated on the progress / status of the Grievance on a periodic basis until the Grievance is resolved.

7.1.4. Customer Grievance Redress Escalation

In case the Customer:

- 7.1.4.1. does not receive a response within the timelines set out in Level 1;
- 7.1.4.2. is dissatisfied with the response received from Credflow Technosoft Private Limited; or
- 7.1.4.3. the Customer may escalate the complaint to the next level as indicated below by setting out a full description of the Grievance and all necessary details and discrepancies due to which the Grievance could not be resolved.
- 7.1.4.4. The Customer can address the escalation to the below address for escalations in accordance with paragraph 7.1.4.3 above:

7.2 Level 2 – Escalation Officer

- **Contact Details:**
 - Name:** Kunal Aggarwal
 - Address:** Credflow Technosoft Private Limited,
D, 9, Vyapar Marg, Block D,
Sector 3, Noida, Uttar Pradesh 201301
 - Email:** kunal@credflow.in
 - Working Hours:** Monday to Friday (10 AM – 7 PM, excluding national holidays)
- **Acknowledgment:** Within 24 business hours.
- **Resolution:** Within 10 business days.

7.2.1 All escalations received are acknowledged and a resolution is provided by Credflow Technosoft Private Limited within the timelines set out in paragraph 8 below.

7.2.2 In case any escalation takes more than the specified resolution time, the Customers are:

- (i) intimidated accordingly; and kept updated on the progress / status of the escalation on a periodic basis until the escalation is resolved.
- (ii) Customers are required to approach Level 2 with the original ticket number generated by Credflow Technosoft Private Limited.
- (iii) The Customer can address the escalation to the below address for escalations in accordance with paragraph 7.1.4.3 above:

7.3 Level 3 – Grievance Redressal Officer (GRO)

7.3.1 The Customer can address the Grievance to the below address for escalations in accordance with paragraph 7.1.4.3 above:

Grievance Redressal Officer:

- **Contact Details:**
 - Name:** Nitin Kumar Rana
 - Address:** Credflow Technosoft Private Limited, [Company Address]
 - Email:** grievance@credflowcapital.in
 - Working Hours:** Monday to Friday (10 AM – 7 PM, excluding national holidays)
- **Acknowledgment:** Within 24 business hours.
- **Resolution:** Within 10 business days.

All escalations received are acknowledged and a resolution is provided by Credflow Technosoft Private Limited within the timelines set out in paragraph 8 below.

7.3.2 In case any escalation takes more than the specified resolution time, the Customers are:

- (i) intimidated; accordingly, and
- (ii) kept updated on the progress / status of the escalation on a periodic basis until the escalation is resolved.

PART 3: TIME ESTIMATES

8. Time Estimates

Credflow Technosoft Private Limited aims to resolve grievances within the following timelines:

Level	Response Time
Level 1 – Customer Service Team	Query response: 24 business hours; Grievance resolution: 10 business days
Level 2 – Escalation Officer	Acknowledgment: 24 business hours; Resolution: 10 business days
Level 3 – Grievance Officer	Acknowledgment: 24 business hours; Resolution: 10 business days

PART 4: REVIEW AND OVERSIGHT

9. Board Approval

The Board has reviewed and approved this Grievance Redressal Policy.

10. Periodicity of Review

This policy will be reviewed periodically as deemed necessary by the Board.

11. Amendments

11.2 Any amendments to this Grievance Redressal Policy will be reviewed and approved by the Board.

11.3 Provisions of this Grievance Redressal Policy are subject to amendments in accordance with Applicable Laws (including rules, regulations, notifications) on the subject as may be issued, from time to time. In case any provisions of this Grievance Redressal Policy are inconsistent with Applicable Laws (including any subsequent amendment(s), clarification(s), circular(s), etc.) then such provisions of Applicable Laws shall prevail over the provisions hereunder and this Grievance Redressal Policy shall be deemed to have been amended to such extent.

12. Publication

This Grievance Redressal Policy will be published on the **Credflow Technosoft Private Limited** website for stakeholder reference.
