

Indifi Capital Private Limited
(formerly known as Riviera Investors Private Limited)

GRIEVANCE REDRESSAL POLICY

Effective Date	June 24, 2025
Version	5.0
Prepared By	Operations Department
Approved By	Board of Directors

Document History:

Version No.	Effective Date	Prepared by	Approved by	Changes made
1.0	August 30, 2019	Compliance & Secretarial Department	Board of Directors	NA
2.0	May 15, 2020	Compliance & Secretarial Department	Board of Directors	No change.
3.0	December 16, 2022	Compliance & Secretarial Department	Board of Directors	Change in Nodal Officer
4.0	September 23, 2024	Compliance & Secretarial Department	Board of Directors	Change in Nodal Officer
5.0	June 24, 2025	Operations Department	Board of Directors	Change in name of the Policy GRM and a few sections further elaborated

GRIEVANCE REDRESSAL POLICY

1. OBJECTIVE

Indifi Capital Private Limited (referred to as the “Company” subsequently) aspires to provide the best customer service to its customers. However, if at any step, the customers feel the need to reach out the Company for a request/query or to lodge a complaint, they may use the framework described in this Policy.

The Company will ensure it provides fair, transparent and timely resolution to their concerns. This system would ensure that the redressal sought is just and fair and is within the given framework of rules and regulation. It will be ensured that complaints are seen in the right perspective and are analysed from all possible angles.

As part of this Policy, the Company shall also ensure to resolve any concern of its customers related with services extended by any of its outsourcing partners.

The Company shall ensure the rights of individuals with physical/visual disability are protected while dealing with the Company. It will ensure there is no discrimination while dealing with such applicants/customers and that the grievances of such applicants/customers are timely and fairly dealt.

This Policy details the approach the Company shall be taking in dealing with various concerns raised by its customers and specifically what would constitute a “Complaint”, its resolution mechanism and monitoring mechanism within the Company.

2. ROLES & RESPONSIBILITY

- i. The Grievance Redressal Mechanism has been laid out and approved by the Board of Directors of the Company ensuring that all disputes arising out of the decisions of the Company’s functionaries are heard and disposed of at least at the next higher level.
- ii. Grievance Redressal Officer (GRO) and Principal Nodal Officer (PNO) have been designated as mandated by the regulations and shall oversee the day-to-day handling of the customer complaints within the Company.
- iii. Customer Service Team (within Operations Department) shall be the primary point of contact for customers for their issues.
- iv. Principal Nodal Officer/Grievance Redressal Officer shall be authorized to coordinate with the Ombudsman Office of RBI regarding Complaints raised by the Office pertaining to the Company.
- v. Board shall be reviewing the Complaints at a quarterly frequency.

This Policy shall be reviewed by the Board at least once a year.

3. MODES OF LOGGING COMPLAINT

The customer can raise the concern to us through an Email, Call, Mobile App (operated by our outsourcing partner Indifi Technologies (I-Tech)), I-Tech website, Physical visit to our HO/Branches, Physical Letter sent to our registered office. The customer could write to us directly on our email/call support numbers or reach us through customer service contact points of I-Tech. In either case, the ownership of resolving customer concern ultimately lies with the Company.

4. DEFINITION OF COMPLAINT

“Complaint” means a representation in writing or through other modes alleging deficiency in service on the part of a Regulated Entity (RE). A Request/Query not resolved by us within the maximum RBI allowed timeline of 30 days to the RE also gets tagged as a Complaint.

5. GROUNDS OF RAISING A COMPLAINT

Following is an indicative list of issues for which a customer can raise a Complaint for:

- i. Error in credit bureau reporting/ wrong enquiry
- ii. Collection interaction issues/ improper recovery practices by Collection staff including those by our outsourced agencies
- iii. Sales interaction issues/ miselling/ miscommitment by Sales staff including those by our outsourced agencies
- iv. Instances of fraud/ identity theft/ bribe asked or taken including those by our outsourced agencies
- v. Failure to ensure transparency in the contract/ loan agreement
- vi. Levying of charges without adequate prior notice to the borrower/ customer;
- vii. Change in loan terms and conditions without any intimation to the customer
- viii. Failure/ Delay in releasing securities/ documents
- ix. No chance given to the borrower for repayment of loan before the sale/ auction of the security
- x. RBI directives not followed by NBFC
- xi. Guidelines on Fair Practices Code not followed
- xii. Professional misconduct by employees of the NBFC

6. GRIEVANCE REDRESSAL MECHANISM (GRM)

Level 1:

Ms. Priyanka Singh (Grievance Redressal Officer)

Email: Customers can write to us at grievances@indificapital.com

Call: Or call us on +91-8882704303 (Monday to Friday from 10am to 7pm except Public Holidays)

Write to us at the below mentioned address:

Customer Service Department

Indifi Capital Private Limited

Plot-19, Ground Floor, Block C, Sewa Tower, Sector-18, Phase-4, Udyog Vihar, Gurugram, Haryana-122015, India.

If the issue is not resolved within 25 days, it may be escalated to Level 2.

Level 2:

Mr. Mayank Mathur (Principal Nodal Officer)

Email: Customers can write to us at pno@indificapital.com

If the issue is not resolved within further 5 days, it may be escalated to Level 3.

Level 3:

In case, there is no reply from the Company within 30 days of receiving the complaint or the complainant is not satisfied with the resolution provided, he/she may write to the RBI Ombudsman through following modes:

Portal: <https://cms.rbi.org.in> / <https://sachet.rbi.org.in> Email: crpc@rbi.org.in

Physical Letters: Centralised Receipt & Processing Centre, Reserve Bank of India, 4th Floor, Sector 17, Chandigarh – 160017

Complete Document on RBI's Integrated Ombudsman Scheme 2021 can be read here: rbidocs.rbi.org.in/rdocs/content/pdfs/RBIOS2021_121121.pdf

Note: Customers to ensure the following to help us serve them timely:

- a. loan account number and contact number to be mentioned in all your communication for us to be able to timely serve you.
- b. Subject line to be retained as it is while escalating the issue from one Level to another

7. CUSTOMER AWARENESS ON GRIEVANCE REDRESSAL MECHANISM (GRM)

1. We have clearly published our GRM on our Company website
2. We communicate GRM clearly on the KFS in all our loan products
3. Displayed GRM clearly in our Registered Office and all our branches

8. CUSTOMER INFORMATION PRIVACY

1. While dealing with customer concerns, we ensure that we are responding with customers on their registered email ID/mobile numbers only.
2. Exceptions could be made if the customer has provided written authorization for alternate email ID/mobile number.
3. Necessary validation takes place on the call before sharing any specific account specific information.

9. GOVERNANCE

1. All customer interactions (Complaints/Queries/Requests) are tracked on a ticketing management system (TMS).
2. A unique ticket ID gets generated and shared with the customer for all interactions.
3. First level review of overall activities of Customer Service Team including Complaints (classification, trend, issues and RCA) by GRO and PNO on a monthly basis
4. Final review of Complaints including classification, trend, issues and RCA, as applicable by the Board of Directors at a quarterly frequency.

ANNEXURE

FLOWCHART OF STAGES OF CUSTOMER INTERACTION

Channel for Interaction

1) Email*, 2) Phone Number*, 3) Mobile App (operated by outsourcing partner Indifi Tech), 4) Indifi Tech Website, 5) Physical Letter, 6) Physical Visit to HO/Branch

*Email/Phone number/website could be of Indifi Capital's or partner Indifi Tech's helpdesk



Interaction Acknowledgement

All tickets* are recorded in a ticket management system (TMS) which issues a unique ticket ID to every ticket. Upon the creation of the ticket, automated acknowledgement is shared with the customer stating that Customer Service Executive (CSE) will reach out within 72 hours (ack email). While handling the ticket, the CSE informs the customer of the expected time of resolution.

*All interactions get recorded in the TMS including those coming through calls/physical visits/physical letters.



Interaction Classification

With pre-filled identifiers, TMS allows to classify a ticket in various categories, Query/Request/Complaint.

In case of wrong classification of the ticket type by the TMS, CSE corrects the classification type manually in the TMS.

Ticket Assignment

TMS auto-assigns tickets to the CSE with round robin logic.

Resolution TAT

As outlined in the acknowledgment email, CSE initiates communication within 72 hours of receiving the concern. All tickets are targeted to be resolved max within 30 days from the date of receipt (RBI allowed max timeline to REs for resolution of issues).



Final Resolution

CSE provides the resolution and necessary closure to the ticket within the above stipulated timelines. Further, the ticket is marked as 'Resolved' in the TMS by the CSE. Pursuant to which, a closure email is initiated to the customer.

If the customer does not respond for 3 days post the receipt of closure email, the ticket automatically gets marked as 'Closed' else the same ticket gets re-opened with overall TAT continuing from the first date of ticket creation. If the customer responds after 3 days, a new ticket gets formed in the TMS which also has a reference to the earlier ticket.

2 stages – Resolved and Closed – exist in the TMS so that the closure of the ticket is not unilateral but only happens once the customer is satisfied with the issue resolution.

End of document