

# GRIEVANCE REDRESSAL MECHANISM

<b>Approved By:</b>	Board of Directors / MD & CEO
<b>Review Frequency:</b>	Annual
<b>Policy Reference No.:</b>	SCPL-GRM-001
<b>Applicable To:</b>	All Customers of Sankalp Capital Private Limited

## 1. Introduction

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Sankalp Capital Private Limited ("the Company" or "Sankalp") is engaged in the business of providing loans to its customers through LSP web/mobile, and aims to impart good customer service and enhance the level of customer satisfaction. The Company believes that customer satisfaction is the key to business growth as well as ensuring a long-lasting relationship with its customers.

This Grievance Redressal Mechanism aims at ensuring prompt redressal of customer complaints and grievances raised through the app or website, or directly via e-mail or contact details provided in the Key Fact Statement (KFS). It also deals with issues relating to services provided by outsourced agency/agencies.

Sankalp's Grievance Redressal Mechanism is formulated in line with the Reserve Bank of India's guidelines on Fair Practices Code, and outlines the framework for addressing customer grievances.

### 1.1 Guiding Principles

The Grievance Redressal Mechanism is founded on the following principles:

- Customers shall be treated fairly at all times.
- All complaints, requests, and queries received from customers shall be responded to with courtesy and resolved in a timely manner.
- Customers shall be informed of avenues to escalate their complaints/grievances within the organisation and of their right to alternative remedy, if they are not fully satisfied with the response of the Company.
- All complaints shall be dealt with efficiently, expeditiously, and fairly, as failure to do so can damage the reputation and business of the Company.
- Employees shall work in good faith and without prejudice to the interests of the customers.
- The Company shall comply with all applicable regulatory requirements and guidelines pertaining to this function.

## 2. Grounds for Filing a Complaint

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Customers can raise/register complaint(s) containing the nature of grievance or deficiency by the Company or any outsourced agency, including but not limited to the following:

- Non-observance of directions issued by RBI to NBFCs.
- Non-adherence to any of the provisions of RBI guidelines on Fair Practices Code, issued from time to time.
- Concerns raised over procedures followed by the Company.

**Please Note:** A complaint is distinct from an enquiry, feedback, or a request for data modification, or an inquiry about loan products/schemes, interest rates, or other requests/feedbacks. Anonymous or incomplete complaints will not be addressed under this Grievance Redressal Mechanism.

## 3. How to Raise Complaints?

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### 3.1 Channels for Raising a Complaint

A customer has the right to lodge/register a complaint if there is a genuine ground for such complaint as indicated in Section 2 above. The following five channels are available for lodging a complaint:

Sl.	Method of Lodging Complaint	Contact Information
1.	E-mail	Queries/Requests: <a href="mailto:help@upcash.in">help@upcash.in</a> Complaints: <a href="mailto:support@sankalpcap.com">support@sankalpcap.com</a>
2.	Web / Digital Platform	Raise a concern directly through the Upcash application.
3.	Postal / Written Letter	Customer Support Department, Sankalp Capital Private Limited, 112 Shakti Nagar, Kota – 324 009.
4.	In Person	Sankalp Capital Private Limited, 112 Shakti Nagar, Kota – 324 009
5.	Telephone	+91 78919 47702 (Between 09:00 A.M. to 09:00 P.M., every day)

Once a complaint is lodged, the customer may also make follow-up calls at the number given below:

Sl.	Mode	Contact Information
1.	Telephone (Follow-up)	+91 78919 47702 (Between 09:00 A.M. to 09:00 P.M., every day)

If a customer has not received a resolution within 15 days, the customer may contact the Grievance Redressal Officer (GRO) as mentioned below:

Name	Contact Details	Address
Nitin CHittora Grievance Redressal Officer (GRO)	E-mail: <a href="mailto:nodal@sankalpcap.com">nodal@sankalpcap.com</a> Phone: +91 9910272387 Monday to Saturday   9:00 AM – 6:00 PM	Sankalp Capital Private Limited, 112 Shakti Nagar, Kota – 234 009

### 3.2 Content / Information Required in a Complaint

While raising a complaint, the following information must be provided by the customer/complainant:

- Customer's full name.
- Registered mobile number of the customer (in working condition).
- Loan ID allotted by the Company.
- Specific details of the complaint/issue along with supporting documents.
- Registered e-mail address.

## 4. Mechanism to Handle Customer Complaints / Grievances

### 4.1 Complaint Registration

A customer can lodge a complaint through the channels mentioned in Sections 3.1 and 3.2. The following process shall apply upon receipt of a complaint:

- Whenever a complaint is received through digital channels, the sender shall receive an acknowledgement within three working days of receipt.
- Whenever a complaint is received in hard copy (letter, etc.), the same shall be recorded in a register and/or online tracker. In all such cases, a Company representative shall contact the customer at the earliest to ascertain the exact nature of the complaint.

- c) In case the customer raises a complaint in person at the Company's office, the customer shall physically record the grievance at the office.
- d) In case of follow-up via the telephonic channel, Sankalp has an exclusive helpline where the customer can discuss the complaint and further escalate the concern as per the Escalation Grid provided in the Annexure.
- e) The Customer Support Department shall always inform the customer of the following:
  - All information pertaining to the issues/concerns raised by the customer.
  - Explanation of the final resolution provided.
  - Expected timelines towards closure (where an immediate solution cannot be provided).
  - Progress updates at defined intervals/milestones and reasons for any delay.
  - Any requirement for additional supporting documents/information, stated clearly along with the reason for such requirement.

## 4.2 Resolution of Grievances

### Grievances shall be resolved as follows:

- a) Grievances related to attitudinal aspects: Such complaints shall be handled courteously, sympathetically, and swiftly. Misbehaviour/rude behaviour towards customers shall be treated with zero tolerance, and immediate action shall be taken. Sankalp, under no circumstances, tolerates misbehaviour of any degree by any representative (payroll staff or outsourced).
- b) Grievances relating to transactions/operations: Sankalp shall be responsible for ensuring rectification of any entry/transaction that falls within its purview. If, upon investigation, it is found that the issue is due to a third party beyond Sankalp's control/operations, the Customer Support executive shall guide the customer and provide avenues to escalate the issue. The Company shall also take such further actions as may be necessary.

## 5. Treatment of Complaints / Grievances / Enquiries

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- a) All complaints/enquiries that can be resolved immediately shall be addressed at the earliest.
- b) For complaints that require verification or further investigation from other departments and cannot be resolved immediately, the customer shall be informed of the expected timelines for closure. Tickets shall be raised and assigned to the concerned departments on priority, with an endeavour to provide resolution within 30 days.
- c) After due investigation, the concerned department shall forward its findings/comments to the Customer Support executives, who shall then provide a resolution to the customer.
- d) The Customer Support Team shall make reasonable attempts to reach the customer to provide resolution against the complaint.
- e) After resolution is provided, the concerned department shall update the status of the complaint as 'Closed' in the system. Closed complaints remain available for re-examination at any point in time.
- f) If any complaint requires additional time beyond 30 days, the Company shall inform the customer of the reasons for delay within the specified timelines and provide expected timelines for resolution.

**Note:** The above timeframe may vary depending on the nature and complexity of the complaint.

In case the customer has not received any reply from the Company within 30 days, or remains dissatisfied with the redressal provided by Sankalp, the customer may escalate the matter to:

- Office-in-Charge, Department of Supervision (NBFC), Reserve Bank of India, Regional Office, Pan Bazaar, Station Road, Guwahati, Assam – 781 001 (through the Complaint Management System (CMS) at <https://cms.rbi.org.in/>, Centralised Receipt and Processing Centre (CRPC)/Consumer Education and Protection Department (CEPC), and/or the Sachet Portal at <https://sachet.rbi.org.in/>); or

- The Ombudsman set up by the Reserve Bank of India (only if the complaint has not already been raised in that forum).
- Please refer to the Annexure – Escalation Grid for further details.

In the event of any complaint regarding customer data, the customer may, after exhausting the grievance redressal mechanisms provided by the Company, escalate the complaint to the Data Protection Board of India, established by the Central Government. The customer may further appeal to the Appellate Tribunal if dissatisfied with the order or direction issued by the Board.

## 6. Time Frame

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Complaints are to be viewed in the right perspective, as they indirectly lead to continuous improvement in the Company's functioning. All complaints shall be analysed from all possible angles.

Activity	Timeline
Acknowledgement of Complaint	Within 3 working days of receipt.
Resolution of Complaint	Maximum within 30 working days from the date of receipt.
Complex / Delayed Complaints	Interim communication to customer stating reasons for delay, along with expected timelines for resolution, within the above specified period.

Every effort shall be made to resolve complaints within the timeframes given above. However, where a complaint is complex in nature and requires additional time, the Company shall proactively inform the customer about the progress and reasons for any delay.

## 7. Review Mechanism

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### 7.1 Periodical Review of Complaints

The Company shall periodically review the process and suggest changes, if any, required to make the Grievance Redressal Mechanism more effective and robust.

### 7.2 Review of the Policy

This Policy shall be reviewed, with the approval of the Board of Directors, at least once a year or earlier if required by applicable rules and regulations. If the Policy is required to be amended due to a change in any statutory/regulatory requirement, the requisite modifications shall be carried out and implemented at the earliest with the approval of the MD/CEO of the Company. The amended Policy shall be placed before the Board at its next meeting for ratification and approval.