



# External Grievance Redress Mechanism Policy

**FinReach Solutions Private Limited**

FinReach Solutions Private Limited	
Policy Title	External Grievance Redress Mechanism Policy
Reviewing Authority:	Managing Director
Approving Authority	<b>Board of Directors</b>
Original Issue Date:	September 2024
Version No.:	01/2024
Effective Date:	September 2024

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## ABBREVIATIONS

COO	Chief Operating Officer
FI	Financial Institutions
GHC	Grievance Handling Committee
GRM	Grievance Redress Mechanism
Head - CMOG	Head of Credit and Middle Office Group
HR	Human Resources
E-GRM	External Grievance Redress Mechanism
NGO	Non-Governmental Organizations
POSH	Prevention of Sexual Harassment

# External Grievance Redress Mechanism Policy for FinReach Solutions Private Limited

## Statement of Purpose

FinReach Solutions Private Limited (hereinafter referred to as “FinReach” or the “Company”) is dedicated to addressing external grievances efficiently and transparently. This External Grievance Redressal Procedure is designed to provide a structured and systematic approach for resolving grievances from various stakeholders, including its customers, investors, contractors, visitors, regulatory bodies, NGOs, Media organisations and others.

The Company is committed to addressing all grievances with efficiency and transparency. The implementation of our External Grievance Redress Mechanism (E-GRM) aims to provide a structured and systematic approach to addressing external grievances promptly and responsibly. It is designed to facilitate the resolution of issues raised by our external stakeholders.

## 1. Scope

This External Grievance Redressal Procedure is designed to provide a structured and systematic approach for resolving grievances from various external stakeholders, including its customers, investors, contractors, visitors, regulatory bodies, NGOs, Media organisations, and others. Any grievance from FinReach’s employee, intern, or contract worker shall be handled as per the detailed Internal Grievance Redress Mechanism Policy of FinReach Solutions Private Limited. Any grievance related to sexual harassment will be addressed in accordance with the procedures outlined in FinReach’s Prevention of Sexual Harassment (POSH) Policy.

## 2. Grievance Handling and Redressal Framework

The specific objectives of establishing an E-GRM for FinReach Solutions Private Limited (hereafter referred to as “FinReach” or the “Company”) are as follows:

- To put in place a structured process of receiving, recording, and resolving grievances from its external stakeholders
- To ensure that comments, responses, and grievances are handled appropriately in a fair and transparent manner, in line with FinReach’s internal policies and international best practices.

This E-GRM policy will be implemented at the operation level.

The E-GRM policy is not a substitute for good day-to-day communication, which all the functional heads of the company and RMs should strive for on a daily basis with the external stakeholders.

It is recognized that the procedures provided in this E-GRM policy does not impede or replace the grievance resolution process offered by the legal system of the country.

### 2.1. Receiving and Recording Statements of Grievance

All grievances received, registered, documented, and tracked through the database will be compiled into regular reports for senior management. These reports will help identify and monitor overall trends and patterns, enabling early detection and understanding of emerging issues. Periodic meetings shall be conducted by the Head – CMOG with the COO and the Managing Director to assess the effectiveness of the Grievance Handling procedure and its implementation. These meetings shall be held on a quarterly basis to review received complaints during the quarter and document the actions taken in response to those concerns.

### 2.2. Grievance Procedure

The Head - CMOG shall ensure that the details of each grievance are properly recorded, including the name of the individual, date, and details of the grievances, resolution with specific date of resolution

### 2.3. Redressal of Anonymous Grievance

An anonymous grievance will be received in writing or phone calls in most circumstances. The grievance will be recorded and checked whether it is in the scope of FinReach for resolution.

The grievances found to be within the scope of FinReach for resolution, will be resolved as per the procedure presented in the previous section (barring the procedure on communicating to the Complainant).

*There are no costs or fees associated with submitting a question or concern through this procedure. The contents of the grievance log and its management will be handled with the utmost confidentiality, particularly with regard to the Complainant. Additionally, the Company guarantees that no unfair practices, such as retaliation, threats, or intimidation, will be directed towards the Complainant.*

*FinReach operates under the expectation and assumption that the involved and/or impacted parties act responsibly when submitting their genuine concerns. FinReach reserves the right to abstain from responding to queries or concerns that are deemed irrelevant or not genuine and will duly document the rationale behind not providing a response.*

### 2.4. Training

The personnel engaging with external stakeholders will be trained to address grievances. The training will comprise of:

- *Expected behaviours and accepted practices when interacting with external stakeholders in order to avoid a grievance in the first instance.*
- *Routes available for external stakeholders to lodge a grievance.*
- *Roles and responsibilities for handling and resolving.*
- *Recording and tracking procedures*

### **2.5. E-GRM Procedure Communication**

The E-GRM Policy and Procedure of FinReach will be made accessible to all relevant external stakeholders of the company. It shall be communicated to all relevant external stakeholders through appropriate channels, such as the company website, agreements and contracts, and company notice boards.

FinReach shall share a copy of this policy with its customers (FIs) and promote addressing of all grievances with efficiency and transparency.

## Annex 1: Contact Details

Phone no	Email
022-46049837	<a href="mailto:grievance@finreach.in">grievance@finreach.in</a>

### Escalation Matrix:

Level 1 Escalation - Dinesh Chugh, Office Executive Assistant

Email - [dinesh.chugh@finreach.in](mailto:dinesh.chugh@finreach.in)

Level 2 Escalation – Manoj Barial, Head of Credit & Mid Office

Email – [manoj.barial@finreach.in](mailto:manoj.barial@finreach.in)

By Post:

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