

# **GRIEVANCE REDRESSAL POLICY**

## **RIKALP CAPITAL PRIVATE LIMITED**

**(FORMERLY KNOWN AS SETHI SECURITIES PRIVATE LIMITED)**

### **CIN NO**

**U65993WB1997PTC083506**

### **REGISTERED OFFICE**

**EAST INDIA HOUSE 20B ABDUL HAMID STREET,  
5TH FLOOR, ROOM NO. 5A-1, ESPLANADE,  
KOLKATA, WEST BENGAL, INDIA 700069**

### **CORPORATE OFFICE**

**PLOT NO. 42, SECOND FLOOR, MONIKA VIHAR,  
MANYAWAS, MANSAROVAR, JAIPUR,  
RAJASTHAN, INDIA 302020**

## **INTRODUCTION**

This policy on Grievance Redressal of the Company, is set out as a mechanism available within the organization to enable the customers, employees, investors and third-party Service Provider of the Company to lodge their complaints / grievances with the Company in relation to their dealings with company being considered for them and for addressing the same in a time bound manner, by following the provisions as provided herein ("the Grievance Redressal Policy").

## **REGULATORY REQUIREMENT**

RBI vide its Master Direction - Reserve Bank of India (Non-Banking Financial Company - Scale Based Regulation) Directions, 2023 dated October 19, 2023, as amended from time to time, ("Master Direction"), RBI Circular on Strengthening of customer service rendered by Credit Information Companies and Credit Institutions dated October 26, 2023, Master Direction Reserve Bank of India (Internal Ombudsman for Regulated Entities) Directions, 2023, directed all applicable NBFCs to ensure that a suitable mechanism exists for receiving and addressing complaints from its customers / constituents with specific emphasis on resolving such complaints fairly and expeditiously regardless of source of the complaints and appoint a Grievance Redressal Officer for redressal of complaints of customers.

## **OBJECTIVES**

Prompt, excellent and efficient customer services and high-level customer satisfaction is the prime objective of the Company. This policy document aims at minimizing instances of customers, employees, investors and Third Party service provider complaints and grievances through proper service delivery and review mechanism and also to ensure prompt redressal of customers, employees, investors and third-party service provider complaints and grievances, if there are any.

The key principles of Company's grievance redressal policy are as under:

- i) Customers, employees, investors and Third-Party Service Provider be treated fairly at all times.
- ii) Grievances raised by customers are dealt with courtesy, efficiency and swiftly, not exceeding within prescribed time lines.
- iii) Complete transparency is maintained with the customers, employees, investors and Third-Party Service Provider;
- iv) The Company's employees act in good faith and without prejudice to the interests of the customer and within the laid down policies and guidelines of the Company.
- v) Customers, employees, investors and Third-Party Service Provider are fully informed of avenues to escalate their complaints / grievances within the organization and their rights to alternative remedy if they are not fully satisfied with the response of the Company to their complaints.

### **MECHANISM FOR COMPLAINTS**

Customers, employees, investors can lodge his / her grievance through any of the following channels:

#### **A. Complaints through physical mode/ post / email:**

- i. The Company will always make effort to redress the complaints of the customers at the earliest and in the best possible way and provide the customer with our best services.

#### **Level- 1**

The customer may visit to the nearest Branch of the Company and the complaint logged in the "Complaint Register" maintained at the branches (During the working hours from 09.30 A.M To 6.30 P.M.). The Branch Manager will act as a first point contact for the customer wherein he can make his complaint in writing.

- ii. In the event of non-disposal of complaint by the designated Branch manager within 15 days, the same will escalate to the Grievance Redressal Officer, who would take steps to resolve the same expeditiously.

#### **Level- 2**

- iii. **Mr. Tulsi Ram Saini** , the Grievance Redressal Officer who can be approached by the public for resolution of complaints against the Company at the following address: -

**Mr. Tulsi Ram Saini**

**Grievance Redressal Officer / Nodal Officer**

**Rikalp Capital Private Limited**

**(Formerly known as Sethi Securities Private Limited)**

**Mail ID: [grievance@rikalp.in](mailto:grievance@rikalp.in)**

**Contact No.: +91 9783333180**

## **B. Grievances lodged through the Office of NBFC Ombudsman**

The Reserve Bank of India has introduced an Ombudsman Scheme for customers of Non-Banking Financial Companies (NBFCs). The NBFC Ombudsman is a senior official appointed by the Reserve Bank of India to redress customer complaints against NBFCs for deficiency in certain services covered under the grounds of complaint specified under Ombudsman Scheme for Non- Banking Financial Companies, 2018 (the Scheme).

For the complainants who are not satisfied with the response or do not receive a response from Compliance Officer within 10 days of receiving the complaint. If more time is required, the Company will inform the customer expected timeline. The Reserve Bank of India has introduced a web based mechanism "Complaint Management System (CMS)", for lodging Complaints / Grievances by Citizens of India which may include the customers as well. This is known as Public Grievance portal (<https://cms.rbi.org.in/>). Customers may make use of the said Portal to communicate their grievances to the Company.

The complaint may also be submitted through electronic or physical mode to the Centralised Receipt and Processing Centre as notified by the Reserve Bank. The complaint, if submitted in physical form, shall be duly signed by the complainant or by the authorised representative. The complaint shall be submitted in electronic or physical mode in such format and containing such information as may be specified by RBI on below address:

**Centralised Receipt and Processing Centre,**

**RESERVE BANK OF INDIA**

**15, Netaji Subhas Rd, Fairley Place,**

**B.B.D. Bagh, Kolkata, West Bengal 700001**

## **RESOLUTION OF GRIEVANCES / COMPLAINTS**

The procedure for addressing customer, employee, investor and third-party service provider grievances is as follows:

- i. The Complaints should be registered in the Grievance Register maintained electronically at Head office and / or physically at every office, and shall include full details of the complainant (name, address and contact details), date of receipt, fact of the complaint etc.
- ii. After receiving the complaint, the Nodal Officer shall forward the complaint to the concerned department head to which the grievance pertains to provide solution/reply of the same.
- iii. The concerned department head shall resolve the complaint within 7 working days of receiving the complaint and report to the Nodal officer.
- iv. Thereafter the nodal officer shall provide resolution to the complainant within 15 working days of receiving the complaint. If more than 15 working days is taken to resolve the complaint than the nodal officer shall provide the resolution stating reason of delay also.

### **TIME FRAME / ESCALATION**

The Company will always make effort to redress the complaints of the customers / investors / employees at the earliest and in the best possible way and provide its best services. In the event of non-disposal of complaint by the Branch Manager/ Grievance Redressal Officer, the same will escalate to the Compliance Officer, who would take steps to resolve the same expeditiously.

- i. All efforts will be made to resolve each complaint received generally within the stipulated time.
- ii. There may be some complaints which require deeper analysis from all possible angles which may cause delayed resolution of the complaint. In such cases, Company will try to resolve the grievances at the earliest, depending on the nature of the case. Such delay in addressing the complaint beyond the prescribed time limit shall be conveyed to the complainant along with reasons for the same.
- iii. If the complaint / dispute related to customer, is not redressed or remains unresolved within a period of 30 days by the Branch Manager/ Grievance Redressal Officer/Compliance Officer, the customer may appeal to the Officer-in-Charge of the Department of Supervision of Reserve Bank of India at following address:

**The General Manager,**

**RESERVE BANK OF INDIA**

**15, Netaji Subhas Rd, Fairley Place,**

**B.B.D. Bagh, Kolkata, West Bengal 700001**

## **MANDATORY DISPLAY AT THE OFFICES**

The Company displays the following information prominently, for the benefit of its customers, at its every place of business:

The name and contact details (Telephone / Mobile nos. / email address) of the Grievance Redressal Officer who can be approached by the customer for resolution of complaints against the Company.

## **INTERACTION WITH CUSTOMERS**

Company recognizes that customer's expectations / requirements / grievances can be better appreciated through personal interaction with customers and publicity of grievance redressal machinery by placing them on its website / its offices at the regional level / corporate office.

## **SENSITIZING OPERATING STAFF FOR IMPROVEMENT IN SERVICE & HANDLING COMPLAINTS**

Company deals with customers, employees, investors and Third-Party Service Provider from different segments, which may give rise to difference of opinion and areas of friction. Company understands the importance of sensitizing staff to handle customer, employee, investor and third-party service provider complaints / grievances with courtesy, empathy and promptness. The Company shall also conduct training programs regularly for staff on customer services and minimizing grievances. Imparting soft skills required for handling customers, would be an integral part of the training programs.

## **RECORD KEEPING**

Complaints record shall be maintained centralized at Head office of the Company and the record of complaints shall be maintained for a minimum period of eight years from the date of resolution.

## **REPORTING TO BOARD OF DIRECTORS**

Summary of the customer grievance reports along with actions initiated would be reported to the Board at least once in a year. The report shall contain information like, the total no. of complaints received, disposed of and pending, with reasons thereof, which will be placed before the Board for information / guidance.

## **REVIEW**

The Company's Directors have been entrusted with the responsibility of enforcement of this policy. They are hereby given absolute power to jointly or severally, make necessary changes, amendments or additions or removals for the operational aspects of the policy within the overall spirit and guidance from time to time for reasons like technology or process upgradation, regulatory changes, maintaining competitive edge or responding to changes in market or risk environment, etc. This is required to ensure full operational freedom to the senior management and make the management team more adaptive to rapid changing external environment. All changes so made shall be noted to the policy approving authority during the next policy review.