



**Sakthi Finance**

Since 1955

# **CUSTOMER GRIEVANCE REDRESSAL ("CGR") POLICY**

(As approved and adopted by the Board of Directors at their meeting held on  
12 February 2026)



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## DOCUMENT CONTROL DETAILS

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ABBREVIATIONS USED

CCMS	Customer Complaint Management System
GRO	Grievance Redressal Officer
NBFC	Non-Banking Financial Companies
RBI	Reserve Bank of India
SFL	Sakthi Finance Limited
SEBI	Securities and Exchange Board of India
TAT	Turn Around Time



## 1.0 INTRODUCTION

1.1. Sakthi Finance Limited (“SFL” or “the Company”) is committed to providing high-quality products and services being one of the outreach for delivery of financial services as an NBFC. Investor’s and Borrower’s interest, being a focal point in maintaining the trust and confidence of its customers, an effective Customer Grievance Redressal Policy (“CGR Policy”) is essential to ensure that customer complaints and grievances are addressed promptly, fairly, transparently and consistently. This policy establishes a structured mechanism for receiving, recording, investigating, resolving, and monitoring customer grievances, while ensuring accountability across the organisation.

## 2.0 OBJECTIVES

2.1. The objectives of this policy are to:

- Provide customers with a clear and accessible mechanism to raise grievances.
- Ensure timely, fair and effective resolution of customer complaints.
- Leverage automation and technology for efficient grievance capturing, tracking and reporting.
- Define clear roles, responsibilities and escalation paths within the organisation.
- Identify systemic issues and drive continuous improvement in products, services and processes.
- Comply with applicable laws, regulations and industry best practices.

## 3.0 SCOPE

3.1. This policy applies to:

- All investing and borrowing customers of the organisation.
- All types of grievances related to products, services, processes, employees, Shareholding partners or third-party service providers.
- All departments, employees and representatives of the organisation involved in customer interactions or grievance resolution.
- Also applicable to shareholders, wherever applicable.



**4.0 DEFINITIONS**

- 4.1. **Complaint / Grievance:** A representation in writing or through other modes alleging deficiency in service on the part of the Company with or without seeking relief thereon.
- 4.2. **Complainant:** A customer who has raised a grievance.
- 4.3. **Customer:** A person who uses, or is an applicant for, a service provided by the Company.
- 4.4. **Deficiency in service:** A shortcoming or an inadequacy in any service, which the Company is required to provide statutorily or otherwise, which may or may not result in financial loss or damage to the customer.
- 4.5. **Grievance Redressal Officer ("GRO"):** The designated official responsible for overseeing grievance handling and resolution.
- 4.6. **Turn Around Time ("TAT") :** The defined time within which a grievance must be resolved.

**5.0 GUIDING PRINCIPLES**

- 5.1. The grievance redressal mechanism shall be governed by the following principles.
- **Accessibility:** Easy and multiple channels for customers to lodge grievances.
  - **Transparency:** Clear communication on process, timelines, and outcomes.
  - **Fairness:** Objective and unbiased assessment of grievances.
  - **Confidentiality:** Protection of customer data and information.
  - **Accountability:** Defined ownership at each stage of grievance handling.

**6.0 CHANNELS FOR GRIEVANCE LODGEMENT**

- 6.1. Customers may lodge grievances through the following channels:
- Direct at branch level through Branch office (in-person or written complaint)



- Dedicated mail id: customercomplaints@sakthifinance.com
- Complaints addressed to Grievance Redressal Officer at Registered office / Nodal officer
- Complaints addressed to Nodal Officer at Registered Office.
- Complaints received through Website address at [www.sakthifinance.com](http://www.sakthifinance.com).
- Complaints received through toll free numbers published.

6.2. All grievances, irrespective of the channel, shall be captured in the Customer Complaint Management System ("CCMS"). Branch-level complaints shall be mandatorily entered into the CCMS on the same working day of receipt.

## 7.0 AUTOMATION AND GRIEVANCE CAPTURING

7.1 The Company shall maintain an automated, CCMS in line with RBI guidelines, with the following features.

- Capture of all grievances received at branch, regional, or central level.
- Generation of a unique complaint reference number.
- Automated acknowledgement to the customer within 24-48 hours.
- Classification by product, issue type, severity and regulatory sensitivity.
- Defined workflows for branch-level resolution and hierarchical escalation.
- Timeline-based alerts and system-driven escalations.
- Audit trail of actions taken and communications sent.
- MIS dashboards for senior management and regulatory reporting

## 8.0 GRIEVANCE REDRESSAL PROCESS

8.1 Step 1 – Receipt and Acknowledgement.

- Every grievance shall be acknowledged within 2 working days of receipt and recorded in the CCMS, a portal maintained by the company.
- The acknowledgement shall include the complaint reference number and escalation matrix.



### **8.2 Step 2 – Branch-Level Resolution**

- All grievances shall first be addressed at the Branch Level.
- The Branch Manager / designated officer shall examine the grievance and attempt resolution. He shall keep the Regional Manager informed about it.
- If resolved at branch level, closure shall be recorded in the CCMS portal with supporting remarks and customer communication.

### **8.3 Step 3 – Escalation to Grievance Redressal Officer (“GRO”)**

- Grievances unresolved within 7 working days at the branch level shall be escalated automatically to the Grievance Redressal Officer (“GRO”). Head of specific product line executive in the customer handling vertical i.e. Deposits and Loan are nominated as GRO's.
- The GRO shall independently review the grievance, seek explanations and ensure fair resolution within the timeline of 15 days.

### **8.4 Step 4 – Escalation to Nodal Officer**

- Grievances involving high value, legal implications, regulatory sensitivity, or customer dissatisfaction with GRO response shall be escalated to the Nodal Officer.
- The Nodal Officer shall provide a final decision-based resolution in accordance with RBI norms within 30 days.

### **8.5 Step 5 – Final Closure**

- Final resolution shall be communicated to the customer with reasons and supporting details.
- Customers shall be informed of their right to approach the RBI Integrated Ombudsman, if dissatisfied.



**9.0 TIMELINES FOR REDRESSAL**

9.1 The standard timelines for grievance resolution are as follows:

Category of Grievance	Level of Handling	Resolution Timeline
<p><b>Low Severity Complaints:</b></p> <ul style="list-style-type: none"> <li>• Routine delayed service issues with limited impact such as:               <ul style="list-style-type: none"> <li>➢ No financial loss or loss <math>\leq</math> ₹ 1,000</li> <li>➢ No regulatory or legal implication</li> <li>➢ No breach of RBI guidelines</li> <li>➢ Isolated incident</li> <li>➢ Non-systemic easily and correctable at branch / first contact.</li> </ul> </li> <li>• Typical Examples: Delay in loan statement issuance, Incorrect SMS / email alert</li> <li>• Minor data entry error without financial impact, Delay in call-back or service request, Clarification on charges already disclosed, Handling Expectations.</li> <li>• Any complaint remaining unaddressed beyond 7 days shall be escalated to next level automatically</li> </ul>	Branch Level	Within 7 working days
<p><b>Medium Severity Complaints:</b></p> <ul style="list-style-type: none"> <li>• Service failure with financial impact, partial non-compliance with internal policy, repeated complaints of similar nature, action causing financial loss of <math>&gt;</math> ₹ 1,000 and up to ₹ 10,000, evident or potential process or control gap, potential infringement policy breach and breach of regulations if permitted.</li> <li>• <b>Typical Examples:</b> Incorrect levy of interest / charges, Delay in loan closure / NOC issuance, Miscommunication on loan terms, Recovery-related grievance without harassment, Partial KYC / documentation lapses and Handling Expectations spelt out by customers.</li> <li>• Any complaint remaining unaddressed beyond 15 days shall be escalated to next level automatically</li> </ul>	Grievance Redressal Officer	Within 15 working days
<p><b>High Severity Complaints:</b></p> <ul style="list-style-type: none"> <li>• Unresolved/High-risk / Regulatory / Complex</li> <li>• All complaints directly reported in the RBI portal shall be addressed by the Nodal Officer. Customers shall be informed and communicated specifically on the complaint with an objective to redress. If the same is not maintainable or unreasonable, a status report shall be sent to RBI with facts, data and documents for logical conclusion in the portal</li> </ul>	Nodal Officer	Within 30 working days



- 9.2 If a grievance cannot be resolved within the stipulated timeline, the customer shall be informed of the reasons for delay and the revised expected resolution date.

## 10.0 ESCALATION MECHANISM

### 10.1 Escalation Hierarchy (RBI-Compliant):

Level 1 : Branch Manager / Branch Operations Team  
Level 2 : Grievance Redressal Officer ("GRO")  
Level 3 : Nodal Officer (as designated under RBI guidelines)

### 10.2 Escalation Triggers

- Non-resolution within prescribed timelines.
- Customer dissatisfaction with the response provided.
- Complaints of serious nature (fraud, major violation of terms of agreement, data privacy, financial mismanagement).
- Escalation shall be system-driven through the CCMS with automated alerts and monitoring

## 11.0 COMMUNICATION WITH CUSTOMERS

- 11.1 Customers shall be kept informed at key stages of the grievance lifecycle.
- 11.2 All communications shall be clear, courteous and documented.
- 11.3 Final closure communication shall include details of the resolution and escalation options, if the customer is not satisfied.

## 12.0 CLOSURE OF GRIEVANCES

- 12.1 A grievance shall be closed only after resolution and communication to the customer.
- 12.2 Customer confirmation of satisfaction may be obtained wherever, feasible.
- 12.3 Closed grievances shall be retained in the system for audit and review purposes.



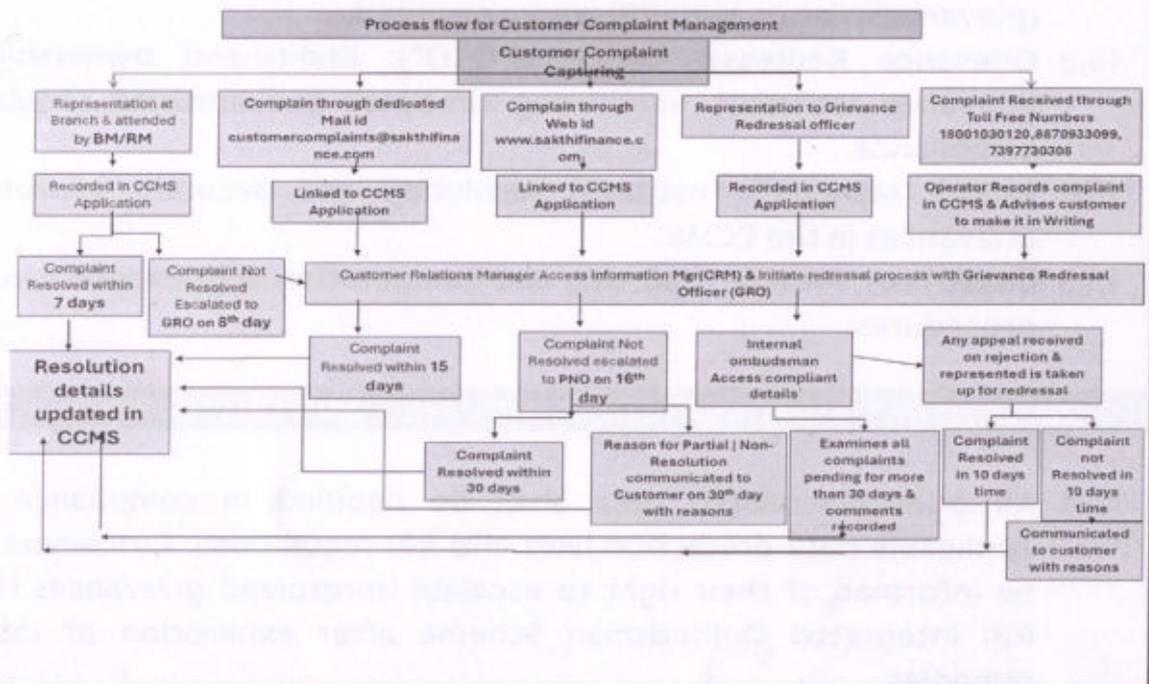
**13.0 FLOWCHART OF "COMPLAINTS MANAGEMENT SYSTEM"**

13.1 CCMS of Sakthi Finance Limited shall follow flow chart depicted below which spells out:

13.1.1 The procedure for lodging a complaint.

13.1.2 Officials designated for this purpose.

13.1.3 Escalation mechanism and hierarchy of officers responsible for handling grievances.



**14.0 MONITORING, REPORTING AND REVIEW BY CUSTOMER SERVICE COMMITTEE**

14.1 A board appointed committee shall oversee the complaints received, addressed, complaints in pipeline, its handling and effective address at regular periodic intervals.

14.2 Committee shall consist of a Director nominated by the Board, Nodal Officer, Senior Level Executives in the customer service vertical of Investors, Borrowers, IT, HR and Finance heads not exceeding 7 members.

14.3 The Board appointed committee shall report to Board on submissions made to it along with its suggestion. The Committee shall also suggest upon improvements / modifications needed in the policy, action taken on training the employees across the company.



- 14.4 Periodic MIS reports shall be generated on volume, nature, resolution time and escalation of grievances.
- 14.5 Trends and root causes shall be analysed to identify systemic issues.
- 14.6 Senior management shall review grievance reports at regular intervals.

## 15.0 ROLES AND RESPONSIBILITIES

- 15.1 **Board / Senior Management:** Oversight, policy approval and periodic review.
- 15.2 **Nodal Officer:** Final authority for resolution of escalated and sensitive grievances; liaison with RBI where required.
- 15.3 **Grievance Redressal Officer ("GRO"):** End-to-end ownership of grievance redressal, monitoring timelines and ensuring regulatory compliance.
- 15.4 **Branch Manager:** First-level resolution and accurate capture of grievances in the CCMS.
- 15.5 **Employees:** Prompt reporting and co-operation in grievance handling procedures.

## 16.0 CONFIDENTIALITY, REGULATORY COMPLIANCE AND CUSTOMER RIGHTS

- 16.1 All grievance-related data shall be handled in compliance with applicable data protection laws and RBI regulations. Customers shall be informed of their right to escalate unresolved grievances to the RBI Integrated Ombudsman Scheme after exhaustion of internal remedies.

## 17.0 POLICY REVIEW AND AMENDMENTS

- 17.1 This policy shall be reviewed periodically, at least once a year, or earlier if required due to regulatory changes, business needs, or operational feedback. Any amendments shall be approved by the competent authority. This policy is effective from the date of approval and supersedes any earlier grievance redressal guidelines or procedures.



**18.0 REFERENCES**

- 18.1 RBI's Circular No.CO.CEPD.PRS.No.S863/13-01-008/2025-2026 dated 9 December 2025.
- 18.2 RBI's Circular No.CEPD.CO.PRD1/S1127/13-01-008/2023-24 dated 2 December 2024.
- 18.3 RBI's Circular No. CEPD.CO.PRD1/S985/13-01-008/2023-24 dated 7 November 2024.

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Place: Coimbatore

(As approved and adopted by the Board of Directors at their meeting held on 12 February 2026)



