

GODREJ HOUSING FINANCE LIMITED

Grievance Redressal Policy

GRIEVANCE REDRESSAL POLICY

Contents

1. Introduction.....	3
2. Applicability.....	3
3. Requirement.....	3
4. Definitions	3
5. Complainant – Role, Rights, Duties and Disqualifications	5
6. The Guiding Principles.....	5
7. Query / Service Request and Complaint	6
8. Exclusions	6
9. Dealing with Anonymity & Pseudonymous Complaints	6
10. Grievance Redressal Mechanism.....	6
11. Preservation of Records	7
12. Grievance Redressal Committee	7
13. Complaint From Other Modes.....	8
14. Turn Around Time.....	8
15. Notifications	8
16. Reporting.....	8
17. Amendment / Modifications / Review.....	9

1. Introduction

Godrej Housing Finance Limited (“GHF or Company”) is committed to a high standard of corporate behavior and to provide such service and benefits to the borrower which are un-paralleled in the industry. To this end, Company understands that an effective Customer Grievance mechanism is a mandatory requirement and has thus formulated a Grievance Redressal Policy (“Policy”) which inter alia also contains Grievance Redressal Mechanism (“GRM”).

The objective of this Policy is to build and strengthen a culture of transparency and trust in the organization and to provide all stakeholders of GHF with a framework / procedure for receiving, registering and disposing of complaints and grievances in each of its offices, including those received on line. to the Company’s management.

2. Applicability

This Policy applies to all customers of the Company.

3. Requirement

Housing Finance Companies (“HFCs”) are required to comply with the ‘Guidelines on Fair Practices Code’ issued by the Reserve Bank of India (“RBI”) under Reserve Bank of India (Housing Finance Companies) Directions, 2025 read with Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025 , as updated from time to time.

As per Para 139 of the Fair Practice Code, *“The Board of Directors of HFCs should lay down the appropriate grievance redressal mechanism within the organization to resolve complaints and grievances.”*

Accordingly, the Company has a board approved Grievance Redressal Policy which inter alia includes GRM.

4. Definitions

In this Policy, the following terms, to the extent not inconsistent with the context thereof, shall have the following meanings as assigned to them:

“Grievance Redressal Officer (GRO)” means an official appointed by the Board of Directors, who is responsible for ensuring timely resolution of all complaints made by customers in line with the Grievance Redressal Mechanism of the Company.

“Complaint”

Any communication from the customer that expresses dissatisfaction about an action or lack of action, about the standard of service/deficiency of service provided by the Company and seeking relief thereon.

Complaints should be raised in the following scenarios.

- a. Escalation for service request/query which is not resolved within timelines by Customer Service team

- b. Bad behaviour of the company employee resulting in dissatisfaction / financial loss / and where customers have cited facts of incident if proven
- c. The complaint/escalation received from regulator is classified as complaint
- d. Cases escalated from the Contact Centre involving service deficiencies in an existing Service Request that prompted the customer to seek resolution from higher management
- e. Customer concern pertaining to charging of high interest/penal charges if proven
- f. Rude behaviour of the employee or recovery agency of the Company during recovery process
- g. Improper conduct by employee or DSA of the Company
- h. Customer concern with respect to Outsourced activity or against Co-lending Partner, Lending Service Provider, Digital Lending App, Account Aggregator Ecosystem
- i. Grievance pertaining to Insurance – Corporate Agency business of Company
- j. Grievance pertaining to delayed updation/ rectification of credit information

Complaint could be for any service / product offered by GHFL or any of our agent / any Digital Lending Partner / any co-lending partner or for Outsourced activity for GHFL or pertaining to Insurance – Corporate Agency or related to Account Aggregator Ecosystem or any other partner or grievance raised by Persons with Disabilities.

“Complainant(s)” mean(s) the person who has made the complaint

“Disciplinary Action” means any action that can be taken on the completion of / during the investigation proceedings in terms of this Policy including but not limiting to a warning, imposition of fine, suspension from official duties or any such action as may be deemed fit considering the gravity of the matter;

“Employee(s)” mean(s) the employee(s) (including outsourced, temporary and on contract personnel) and Directors, Key Managerial Personnel and Senior Management Personnel as defined under the Companies Act, 2013;

“Good Faith” means there is a reasonable basis for communication of unethical and improper practice(s) or any other alleged wrongful conduct;

“Grievance Redressal mechanism” is the mechanism, as detailed in the policy which shall be followed for resolution of complaints

“GRIDS” means Grievance Registration & Information Database System (GRIDS) which is a grievance redressal mechanism introduced by National Housing Bank (“NHB”).

“NCH” means National Consumer Helpline which is a project of Ministry of Consumer Affairs and has a mechanism call “Integrated Grievance Redressal Mechanism, INGRAM”

“NHB” means National Housing Bank which has been established under National Housing Bank Act, 1987

“Representative” means any person or group of persons, including but not limited to, Connectors, Direct Selling Agents, Legal / Technical Vendors, enforcement agencies who represent GHF and are in direct contact with the customer;

“Subject” means a person or group of persons against or in relation to whom a protected disclosure is made or evidence gathered during an investigation;

Terms that have not been defined in this policy shall have the same meaning as assigned to them in the NHB Act, 1987 and Companies Act, 2013 or any other relevant legislation, as amended from time to time.

5. Complainant – Role, Rights, Duties and Disqualifications

Role, Rights and Duties

- ✓ The Complainant's role is that of a reporting party with genuine grievance.
- ✓ Complainant shall be provided with an acknowledgement number and name / details of person who shall handle the complaint
- ✓ The complainant has a right to know the status of his application and of the final decision taken by the Grievance Mechanism.
- ✓ Complainant is being informed about procedure to raise complaint and in what time his complaint is expected to be resolved.
- ✓ The Complainant has a duty to provide all necessary information and extend all required support to Grievance Mechanism to ensure timely and accurate resolution of his / her complaint.

Disqualifications

- Complainant, whose Complaint has been found to be malafide, frivolous, malicious or otherwise than in Good Faith shall be disqualified from making further Complaint under this Policy. The GRO shall have the authority to determine a complainant as habitual complainant. It is clarified that no person who has made multiple genuine complaints shall be tagged as a habitual complainant.
- GRO may in extreme cases where the complainant is abusive, threatens physical violence or commits physical violence against the staff or in GHF premises may refuse to entertain the complaint.

6. The Guiding Principles

To ensure that this Policy is adhered to, and to assure that the concerns will be acted upon seriously, GHF will:

- Ensure that Complaints are acted upon in a time bound manner;
- Ensure that the identity of Complainant is not disclosed for general consumption if the complaint is of a sensitive nature or when harm may come to the Complainant if his identity is revealed;
- Not attempt to conceal evidence of the Complaint;
- Ensure that along with complaint resolution, Company will also find out the root cause leading to repeated complaint/on case to case basis and attempt to resolve the issues emanating from it,
- Equal opportunity for grievance redressal shall be provided to people with physical disabilities including those who are visually impaired
- Resolve the complaint as per the Company Policy and extant regulations

7. Query / Service Request and Complaint

Company has set-up a process to effectively address queries / service requests of applicants / borrowers regarding loan process or active loans. The Company shall:

- Ensure that these queries / service requests are addressed quickly,
- Ensure that queries / service requests are met within prescribed Turn Around time,
- Ensure that un-addressed queries / service request do not result into complaint.

8. Exclusions

The following types of Complaints will ordinarily not be considered and taken up for investigation in terms of this Policy:

- Complaints that are Illegible.
- Complaints that are trivial or frivolous in nature,
- Complaints that do not contain details sufficient to institute an enquiry,
- Complaint which has already been addressed,
- Complaint, which is incomplete/arbitrary/ambiguous or vexatious or filed without any sufficient cause or involving decision / policy by which the Complainant is not affected directly/indirectly
- Matter involving Company's internal HR & Administration issues like staff pay & emoluments, transfer, promotion, contractual termination, commission to vendors etc.
- Matters which are pending before a court of Law, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body.
- Any unethical and improper practice which is alleged to have been committed prior to 1 (one) years period from the date of Complaint and the same can't be investigated on current dates due to absence of sufficient evidences, documents and records.

9. Dealing with Anonymity & Pseudonymous Complaints

- A Complainant may choose to keep his / her identity anonymous. In such cases, the complaint should be accompanied with strong evidences, documents and data.
- Similarly, a pseudonymous Complaint will not be rejected if it is accompanied with strong evidences, documents and data.
- Decision of GRO with respect to acceptance of anonymous / pseudonymous complaint will be final and binding.

10. Grievance Redressal Mechanism

Any customer having grievance / complaint / feedback with respect to the product and services offered by the Company may write to the Company's Customer Service Department through any of the following channels:

The Company shall ensure timely redressal of complaints of all customers including physically / visually challenged customers.

The GRM will also deal with the issues relating to services provided by the outsourced agency.

Level I	Call us on 022-68815555 (From Monday to Sunday, 9:00 AM to 6:00 PM) or Email to customercare@godrejcapital.com Visit the website - https://housingfinance.godrejcapital.com/ Write a letter addressed to : Customer service Team, Godrej Housing Finance, Godrej One, Pirojshanagar, Vikhroli East, Mumbai, 400079, Maharashtra, India
Level II	If you have not received a satisfactory response for your grievance within 7 working days , please reach out to our Grievance Redressal officer Sandip Barmera nodalofficer@godrejhf.com +91 7317157126 Godrej Housing Finance, 9 th Floor, Godrej One, Pirojshanagar, Vikhroli East, Mumbai, 400079, Maharashtra, India
Level III NHB (In case delayed or no response)	In case your grievance is not addressed within one month of registering with us or are dissatisfied with the response received, you may approach the National Housing Bank at the address given below: Grievance Redressal Department of NHB Online mode: https://grids.nhbonline.org.in OR Offline mode: By post, in prescribed format available at http://www.nhb.org.in/%20Grievance-Redressal-System/Lodging-Complaint-Against-HFCsNHB%E2%80%25%2093Physical-Mode.pdf to NHB at the following address: The Grievance Redressal Department, National Housing Bank, Core 5A, India Habitat Centre Lodhi Road, New Delhi- 110 003
Complaints pertaining to Insurance – Corporate Agency	Grievance Redressal Cell of the Insurance Regulatory and Development Authority of India General Manager Insurance Regulatory and Development Authority of India (IRDAI) Policyholder's protection & Grievance Redressal Department – Grievance Redressal Cell. Sy.No.115/1, Financial District, Nanakramguda, Gachibowli, Hyderabad – 500 032. Email: complaints@irdai.gov.in Bima Bharosa system - IRDAI Portal at https://bimabharosa.irdai.gov.in/ Contact : Toll Free No. 155255 or 1800 4254 732.

*- For accurate and timely resolution, customers are requested to provide all the necessary details like the Customer Information Number (CIF), Loan Account Number (LAN), details of the feedback, suggestions, complaint and valid contact Information including phone number & e-mail ID while first contacting the Company.

11. **Preservation of Records**

The records pertaining to complaint shall be preserved for a period of three years from the date of final intimation of closure to the Complainant.

12. **Grievance Redressal Committee**

Company has constituted a Board level Grievance Redressal Committee which reviews the grievances and action taken by Company to address grievances on quarterly basis. The GRC shall interalia:

- Review complaints received from customers
- Recommend measures to obviate / minimize emergence of such complaints,
- Review and recommend modification in grievance redressal policy,
- Any other matter as per extant rules and guidelines.

13. Complaint from other Modes

- Other than the abovementioned modes, complaints can also be received through NCH or GRIDS
- On receipt of complaint through NCH or GRIDS, the mechanism prescribed in Grievance Redressal Mechanism shall be followed
- However, for complaints received through NHB GRIDS, concurrence of Chief Compliance Officer shall also be sought

14. Turn Around Time

The Turn Around Time (TAT) which shall be followed in event of receipt of service request is as below:

S.No	Category	Turn Around Time (Days) #
1	EMI Issues	5
2	Foreclosure Inquiry / SOA Request	21
3	Refunds	15
4	Property Papers	30
5	SMS Request post closure	15
6	Sanction Pending Disbursement	15
7	Updation/ rectification of credit information	21*

#TAT to be calculated from the date when complete information with respect to service request has been provided

** Company shall update/rectify credit information within 21 days and in case the delay is attributable to the Company, Company shall compensate Customer as per extant guidelines.*

15. Notifications

- The policy will be made available to all employees of GHF
- The details of Grievance Redressal mechanism is being displayed at all branches and is available on the website of the Company.

16. Reporting

- A quarterly report on all service requests / queries & complaints shall be presented to the Grievance Redressal Committee,
- Any complaint which remains un-addressed for over 4 weeks shall also be presented to the Grievance Redressal Committee,
- A half-yearly review of Grievance Redressal Mechanism shall be presented to the Board of Directors,
- Review of the Root Cause Analysis (RCA) of customer grievances shall be presented to Grievance Redressal Committee on annual basis.

17. *Amendment / Modifications / Review*

- There shall be an annual review of the Policy by the Board of Directors
- Board of Directors can at any time modify or amend, either the whole or any part of Policy

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