

1. Introduction:

Kuhoo Finance Private Limited (the “Company”) is registered with RBI as a Base Layer NBFC. The company is primarily engaged in the retail lending activities primarily in the segment of student education.

As per the company’s strategy, its target markets are primarily students and its lending products include education loan for tuition fees, and living expenses and other education related expenses, etc. For smooth functioning of its lending activity the company understands the requirement to adhere with RBI guidelines issued from time to time.

This policy is prepared in line with the requirements prescribed by Reserve Bank of India (Non-Banking Financial Company – Scale Based Regulation) Directions, 2023 and various RBI notifications / directions [“RBI Regulations”] issued in this regard

2. Objective:

The objective of the said policy is to:

- Support the efficient functioning of the Fair Practice Code
- Establish a mechanism to resolve customer complaints and place relevant controls to examine its effectiveness and reduce the number of complaints.
- Designing an appropriate appraisal matrix for escalation of the complaint/ dispute.
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- Ensure effective and time-bound resolution of all complaints or grievances, providing fair and reasonable outcomes within the prescribed framework of rules, regulations, and timelines.

3. Grievance Redressal Mechanism:

The Company has implemented an appropriate grievance redressal mechanism comprising of members nominated by the Board. This mechanism ensures that all disputes arising from business operations, as well as complaints related to services outsourced to external agents (if any), are heard and resolved in accordance with the defined process. The customers may raise grievances, in any matters relating to the Credit Facility extended to it or the Application through which facility is provided, including but not limited to:

- 3.1. Interest Rate charged on the credit facility
- 3.2. Loan terms and conditions
- 3.3. Penal Charges wrongly debited
- 3.4. in case of detection of fraud/suspicious activity in its loan account on its Digital Lending Application

The mechanism for grievance redressal is as follows

- The company commits and assures to provide the best possible recourse to resolve the grievance within the defined time frame. The company would adequately train the operational staff to give consideration to the participants in financial distress and would try to render such help as may be possible.

- The company shall ensure that an updated version of the Mechanism is accessible to the customer on the website of the company providing relevant details on:
 1. Where a complaint can be made
 2. How a complaint should be made
 3. When to expect a reply
 4. Whom to approach for redressal of grievance, etc.

- The company has provided the following matrix under Grievance Redressal Mechanism to resolve any of its customers query/grievance:

Level 1:

- The customer shall lodge an initial level complaint by sending a email to care@kuhoo.com_____ (email id) or to the company through the official website/App _www.kuhoo.com_____ with subject line “Complaint & Grievance Register”. The details shall also be available to the customers in the Key Fact Statement/ Loan Agreement.
- The company shall respond to the complaint within __14_ working days from the date of receipt of the complaint.
- The Company shall examine and respond to the complaint via an email or phone In a case where the complaint requires more than the stipulated time, reasonable justification shall be provided.

Level 2:

- If the customer is still not satisfied with the response received, or if the customer does not receive any response within __14__ working days, then the customer can write or email, to the Grievance Redressal Officer of the company as mentioned below:

Name	Nilesh Abhang
Address	Plot C-20, G Block, Near MCA, Bandra Kurla Complex, Bandra East, Mumbai - 400051
E-mail ID	feedback@kuhoo.com

- The Grievance Redressal Officer shall maintain a detailed record of all the complaints/grievances received through any of the mediums above and ensure that the same are addressed and resolved within __30__ working days.
- The Details of Grievance Redressal Officer shall be available on the company /Website and App and also displayed in the registered office and all other places of operations of the company.

Level 3: Reporting to RBI (same included in FPC)

If customers' complaints still remain unresolved and are not redressed within a period of 30 days, then the customers may approach the regulatory authority of Non-Banking Financial Companies, i.e., Reserve Bank of India

Level 4: Integrated Ombudsman

- If the complaint / dispute is not redressed within a period of ____30 working days_____, the customer may appeal under the INTEGRATED OMBUDSMAN SCHEME, 2021. Complaint forms shall be available in the registered office as well as other places of operation along with website/App.
- The copy of such scheme and information of Nodal Officer and Ombudsman shall be made available to the customer over its /website/App. The Details of the Ombudsman along with Nodal Officer of the company shall be at display at all offices of operation of the company
- Complaint form is added at the end of the policy for perusal of the customer.

Note: In accordance with Guidelines on Digital Lending dated 02nd September 2022 prescribed by RBI, the grievance redressal mechanism prescribed herein shall also be available for the customers on-boarded to the Company via LSP / DLA of the company

4. Complaints pertaining to Data reported to CICs

For complaints pertaining to reporting the data to Credit Information Companies namely (CRIF HIGHMARK, CIBIL, EQUIFAQ and EXPERIAN) the customer may raise a dispute with their respective website.

The customer's dispute shall be resolved by the Nodal Officer appointed by the company for resolving disputes relating to data reported to Credit Information Companies. The details of the said Nodal Officer shall be available on the website of the company separately from normal grievance redressal officer and Nodal Officer (under Integrated Ombudsman Scheme) with following details:

Name: [•] Nilesh Abhang
Designation: [•] Grievance Redressal Officer
Email id: [•] Feedback@kuhoo.com

5. Customer Grievance Register:

The complaints received via mails, website, calls, CMS portal of RBI as well as credit information companies shall be registered in the Customer Grievance Register (CGR) maintained electronically in a software, and shall include full details of the complainant along with the nature of the complaint inter-alia including:

- the date of receipt of complaint,
- fact of the complaint,
- date of resolution,

- nature of resolution provided, etc.

The Customer Service team shall be the custodian of this register.

6. Disclosures:

The Company shall prominently display the Grievance Policy, Grievance Redressal Officer's name and email id (Primarily in English and in any other language upon specific request from the customer in writing or call ,) at all the branches of the Company along with the document on Salient Features of the Integrated Ombudsman Scheme.

7. Evaluation of Grievance Redressal Mechanism:

. The Company shall conduct a quarterly review (or as required) of the compliance with the Grievance Redressal Mechanism at various levels of management. A consolidated report of such reviews shall be submitted to the Board.

Relevant Details for disclosure in the Annual Audited Financial Statements shall be recorded

Exception Handling

The policy shall always be updated with extant regulatory provisions. However, in case of conflict between the Policy and regulations, the regulatory provisions shall always supersede the policy.

The updated policy shall be adhered to at all times and exceptions if any to the policy shall be approved by the board of directors after recording a reason in writing.

Annexure A

FORM OF COMPLAINT (TO BE LODGED) WITH THE OMBUDSMAN

[Clause 11(2) of the Scheme]

(TO BE FILLED UP BY THE COMPLAINANT)

All the fields are mandatory except wherever indicated otherwise

To

The Ombudsman

Mumbai Regional Office,

Mumbai.

Madam/Sir,

Sub: Complaint against KUHOO FINANCE PRIVATE LIMITED (RBI Regulated Non-Banking Financial Company)

Details of the complaint:

1. Name of the complainant _____
2. Age (years) _____
3. Gender _____
4. Full address of the complainant

Pin Code _____

Phone No. (if available) _____

Mobile Number _____

E-mail (if available) _____

5. Complaint against KUHOO FINANCE PRIVATE LIMITED
6. Nature of relationship / account number (if any) with the Regulated Entity

7. Transaction date and details, if available

(a) Date of complaint already made by the complainant to the Regulated Entity (Please enclose a copy of the complaint)

(b) Whether any reminder was sent by the complainant? Yes/No
(Please enclose a copy of the reminder)

8. Please tick the relevant box (Yes/No)

Whether your complaint:

(i)	is sub-judice/under arbitration?(*)	Yes	No
(ii)	is made through an advocate, except when the advocate is the aggrieved party?	Yes	No
(iii)	has already been dealt with or is under process on the same ground with the Ombudsman?	Yes	No
(iv)	is in the nature of general complaint/s against Management or Executives of a Regulated Entity?	Yes	No
(v)	is on account of a dispute between Regulated Entities?	Yes	No
(vi)	involves employer-employee relationship?	Yes	No

9. Subject matter of the complaint

10. Details of the complaint: (If space is not sufficient, please enclose a separate sheet)

(*) Complaint is sub-judice/under arbitration if the complaint in respect of the same cause of action is already pending/dealt with on merits by any Court, Tribunal or Arbitrator or any other Authority, whether individually or jointly.

11. Whether any reply has been received from the Regulated Entity within a period of 30 days of receipt of the complaint by it? Yes / No
(if yes, please enclose a copy of the reply)

12. Relief sought from the Ombudsman
(Please enclose a copy of documentary proof, if any, in support of your claim)

13. Nature and extent of monetary loss, if any, claimed by the complainant by way of compensation (please refer to clauses 15 (4) & 15 (5) of the Scheme)

INR

14. List of documents enclosed:

Declaration

- (i) I/We, the complainant/s herein declare that:
 - a. the information furnished above is true and correct; and
 - b. I/We have not concealed or misrepresented any fact stated above, and in the documents submitted herewith.
- (ii) The complaint is filed before the expiry of a period of one year reckoned in accordance with the provisions of clause 10 (2) of the Scheme.

Yours faithfully

(Signature of the Complainant/Authorised Representative)

AUTHORIZATION

(If the complainant wants to authorise a representative to appear and make submission on her/his behalf before the Ombudsman, the following declaration should be submitted)

I/We _____ hereby nominate Shri / Smt _____ as my / our authorized representative whose contact details are as below:

Full address:

Pin Code _____

Phone No. (if available) _____

Mobile Number _____

E-mail (if available) _____

