

POLICY ON GRIEVANCE REDRESSAL MECHANISM

Current Version:	4.0
Information classification:	INTERNAL
Document No.:	NeSL/COMP/L2/GRP/01

Document History:

Version	Author	Date	Reviewer	Date	Approver	Date	Comments
1.0	Company Secretary	10-07-2017	MD & CEO	20-07-2017	Board	02-08-2017	Board Approved
	Signature		Signature		Signature		
2.0	Compliance Officer	01-03-2019	MD & CEO	16-03-2019	Board	23-03-2019	Board Approved
	Signature		Signature		Signature		
3.0	Compliance Officer	18-04-2023	MD & CEO	5-06-2023	Board	14-06-2023	Board Approved
	Signature		Signature		Signature		
4.0	DVP-Operations	04-08-2023	MD & CEO	24-08-2023	Board	01-09-2023	Board Approved
	Signature		Signature		Signature		

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NATIONAL E-GOVERNANCE SERVICES LTD

GRIEVANCE REDRESSAL POLICY

1. OBJECTIVES

- 1.1 National e-Governance Services Ltd (hereinafter referred as “NeSL” or “Company”) believes that providing prompt and efficient service to its customers is essential for all its services.
- 1.2 Further, as per the provisions of Insolvency and Bankruptcy Board of India (Information Utilities) Regulations, 2017 (“**IU Regulations**”), every Information Utility (“**IU**”) is required to draft its own bye-laws. Additionally, Clause (d) of Regulation 15(3) of IU Regulations clearly states that the bye-laws of an IU shall provide for grievance redressal also.
- 1.3 Furthermore, every IU is obliged to submit to IBBI, along with application for registration, the details of infrastructure it currently has and proposes to have, to enable it to discharge its functions as an IU, including details of grievance redressal and disciplinary proceedings.
- 1.4 Thus, in order to comply with the above mentioned provisions, NeSL has formulated this Grievance Redressal Policy (“**Policy**”) in accordance with the requirements specified under Regulation 15(3)(d) read with Regulation 12 of IU Regulations. The Policy aims at minimizing instances of customer complaints and grievances through proper service delivery and review mechanism, and to ensure prompt redressal of customer complaints and grievances. The review mechanism will also help in identifying shortcomings in product features and service delivery.
- 1.5 The Company’s Policy on Grievance Redressal follows the undernoted principles:
 - a. NeSL shall provide services with due and reasonable care, skill and diligence and holds the information as custodian;
 - b. NeSL shall provide services without discrimination in any manner;
 - c. NeSL shall treat its users fairly at all times;
 - d. NeSL shall charge uniform fee for providing the same service to different users.
 - e. Complaints raised by users will be dealt with courtesy and in time;
 - f. Users will be fully informed of avenues to escalate their complaints / grievances within the organization and their rights to alternative remedy, in case they are not fully satisfied with the response of the Company to their complaints;
- 1.6 In order to make the Company’s redressal mechanism meaningful and effective, a structured system will function, which will ensure that redressal sought is just and fair, and is within the given legal framework.

- 1.7 All employees of NeSL handling complaints shall be trained and made aware about the complaint handling process to ensure better service.
- 1.8 The customer complaint may arise due to- (i) inadequacy of functions / arrangements made available to users or (ii) gaps in standards of services expected and actual services rendered;
- 1.9 The user can register his complaint if he is not satisfied with the services provided by the Company. The user can give his complaint to NeSL online or by SMS/ e-mail or over the phone. The customer complaint shall be resolved within a given time frame, which if unsuccessful the complainant can approach a Grievance Redressal Committee and finally the selected person from the panel of Arbitrator approved by the Governing Board of the company.

2. FORMAT AND MANNER FOR FILING GRIEVANCES

- 2.1 A registered user may file a complaint/grievance in respect of the services provided by NeSL online by logging on to the website or the user may send an email at grievances@nesl.co.in.
- 2.2 An escalation matrix for complaints will also be made available on the Company's website, SMS/ WhatsApp at the contact numbers.
- 2.3 All the complaints/grievances received from users will be acknowledged by the Company by way of communication in the form received within a time frame of 3 days by electronic/ other mode and steps should be taken simultaneously for resolving them.
- 2.4 The Company will endeavour to resolve all complaints within 7 working days. The maximum time within which the Company will dispose of the grievance will be 30 days from the date of receipt as provided on the audit trail of the complaint.

3. INTERNAL MACHINERY TO HANDLE CUSTOMER COMPLAINTS / GRIEVANCES

- 3.1 **Nodal Officer:** Company shall designate a Nodal Officer to be known as the Customer Relationship Officer in its Administrative Office, who shall receive grievances and coordinate to ensure their successful resolution. His /her designation and email ID will be displayed on the company's website. He/she shall ensure disposal of the complaints /grievances of users, within the stipulated time and escalate within the organization as maybe required for timely disposal.
- 3.2 **Grievance Escalation System:** The complaints/grievances lodged by users shall be analyzed and redressed by the Nodal Officer designated for the purpose within a period of 7 days from the date of receipt. If need be, he/she shall contact the complainant personally and dispose of the complaint.
If the grievance received is not resolved within a period of 7 days from the date of

receipt, it shall be auto-escalated to the Grievances Redressal Committee.

- 3.3 Grievances Redressal Committee: If the user is not satisfied with the response of the Nodal Officer, he/she may escalate the issue to the next higher authority i.e., Grievances Redressal Committee. The Grievances Redressal Committee shall comprise of three members viz., (1) Managing Director as the Chairperson of the Committee (2) Executive Director and CRO & (3) Chief Technology Officer.

The functions of the Committee will include looking into the grievances escalated from Nodal Officer and taking appropriate action in such cases on merits, within a maximum period of 30 days. The Committee would further review and analyze the pending cases and issue appropriate directions for resolving the same

- 3.4 Where the complaints have not been resolved within the maximum period of 30 days, despite best efforts, the grievance redressal committee shall escalate such cases to the governing board for resolution/ directions.

3.5 Review:

The governing board of the Company shall critically examine on an ongoing basis as to how grievances redressal machinery is working and whether the same has been found to be effective, on an ongoing basis, as at 31st March of every calendar year, by the IU Operations Department.

- 3.6 The details on complaints received, resolved and pending, with reasons therefor will be placed before the governing board, on annual basis, as at 31st March of every calendar year, by the IU Operations Department.

The IU Operations Department shall act upon the observations and directions of the Governing Board in this regard and compliance will be ensured.

After the review by the Governing Board of NeSL, the data relating to Grievances Received, Redressed and Pending, in a financial year may also be disclosed to the public by placing the connected details in the Company Website as at 31st March of every Calendar Year.

- 3.7 Mediation: Wherever applicable, the selected person from the panel of Arbitrators approved by the Governing Board of the company would mediate proceedings to the parties to the grievance till resolution of the grievance.

4. ONLINE GRIEVANCE REDRESSAL SYSTEM

- 4.1 To facilitate the users to file their grievances, the Company has developed and enabled a system of online grievances tracking system. It would be made available on the Company's website. Letters on paper, if received, will be merged into this system of online tracking.

- 4.2 Every time a complaint/ grievance is lodged by a customer online, a unique reference number is generated by the system for the reference of customer. The system records a complaint and provides the customer, the complaint status tracking. The information about redressing the issue is given to the user by the mode in which complaint is received.
- 4.3 The Company will monitor the complaints registered under this system on a daily basis and will ensure their resolution promptly.
- 4.4 Effectively, all the activities starting from lodging of complaint till its closure by the Company would be made online in an automated environment and the complainant can view the status of the complaint online from the company's website from anywhere by using the reference number.
- 4.5 Every complaint has an audit trail; and all the complaints are saved in a central database which generates relevant MIS reports to enable the Company to review and take appropriate decisions, remedial actions and policy changes, where required.

5. TYPES OF COMPLAINTS HANDLED BY THE COMPANY

The Company shall accept and entertain only the complaints/grievances arising out of activities undertaken by the Company as per the provisions of IU Regulations, which broadly cover the following areas of the information processing handled by the Company:

- Registration
- Submission
- Updation
- Error Correction
- Data Retrieval
- Authentication and Verification

6. MATTERS THAT ARE NOT CONSIDERED AS COMPLAINTS BY NeSL

- Complaints that are incomplete or not specific Offering
- suggestions or seeking guidance/explanation
- Not satisfied about the fee charged/ fee structure of the Company
- Disputes arising out of agreements / terms with the bank/s
- Complaints about sub-judice matters
- Complaints falling under the purview of other Regulatory Authorities.

7. ACTION IN CASE OF MALICIOUS OR FALSE COMPLAINTS

In the event of Company receiving any malicious or false complaints, based on merits of individual cases, suitable letters will be addressed to such complainants with stern caution against their recurrence. In deserving cases, the Company may even examine

instituting appropriate legal proceedings against such parties making such malicious complaints.

8. DISCLOSURES/REPORTING BY THE COMPANY

- 8.1 Upon dismissal or resolution of the grievance by the Company, the Company shall provide a report to the parties to the complaint of the grievance and proceedings undertaken by the Company including details of the mediation proceedings, if any.
- 8.2 Also, the Company shall disclose the information relating to receipt and disposal of grievances to the public in the form and manner as directed by the Board.

Annexure A

FORMAT FOR FILING GRIEVANCES

From

Customer Name &
Address Registration No.

To

Nodal Officer,
National E-Governance Services Limited
Administrative Office:
5th Floor, The Estate, 121, Dickenson Road,
Bangalore-560042

Customer Information:

Name of the customer
Contact Telephone / Mobile No. &
E mail id:
Registration No.

Name of account/party relating to which information has been sought:

Ref. No. of NeSL, relating to above account/party

Nature & Gist of Complaint:

Date:

Signature of Customer

Annexure B

Format for acknowledgement of Complaint

Date:

To
(In the case of written complaints) Name of complainant
Address:

Ref: Your complaint dt. ____
Complaint No. _____

We are in receipt of your complaint related to the services of NeSL.

We are looking into your complaint and we will revert to you within a maximum period of 7 working days.

We value your relationship and assure you that your complaint shall be attended to. In this regard please note that we may contact you for further information, in case it is need, to help resolve the matter early.

Please quote the complaint number above in all future correspondence.

(Nodal Officer)