GRIEVANCE REDRESSAL MECHANISM POLICY

Regulatory Basis	July 01, 2026, | RBI Scale Based Regulation (SBR) Framework & Master Directions
Approving Authority	Board of Directors
Review Frequency	At least annually and earlier where required

1. Purpose and Regulatory Scope

Comero Leasing and Financials Private Limited ("the Company"), being a Non-Banking Financial Company – Investment and Credit Company (NBFC-ICC) classified under the Base Layer (NBFC-BL), with customer interface and availing public funds, shall maintain a transparent, accessible, accountable and time-bound grievance redressal mechanism in accordance with the applicable directions, circulars and guidelines issued by the Reserve Bank of India ("RBI"), including the applicable requirements relating to the Fair Practices Code, customer grievance redressal, digital lending, credit information reporting.

2. Scope and Coverage

This policy applies across all financial services, credit products, leasing arrangements, digital lending channels, and physical operational points operated by the Company, specifically including its digital lending platform www.xpressloan.in It covers all customer complaints and grievances concerning:

a. Deficiencies in lending service, interest rate computation discrepancies, sanction/disbursement delays, or account statement errors.
b. Conduct, practices, and misrepresentations by Lending Service Providers (LSPs) or Digital Lending Applications (DLAs) engaged by the Company.
c. Actions, harassment, or unethical recovery practices by recovery agents.
d. Credit history reporting and reporting of account status to Credit Information Companies (CICs).
e. Data privacy, unauthorized information sharing, and technology security incidents across digital channels.

3. Three-Level Internal Escalation Matrix

In compliance with RBI customer protection guidelines, the aggregate resolution timeline across all internal escalation channels shall not exceed 30 consecutive calendar days from the date of initial receipt of the complaint.

Level 1: Primary Customer Care Desk

Customers may lodge their complaints through frontline digital or telephonic channels:

- **Digital Helpdesk:** grievance@xpressloan.in

- **Toll-Free Helpline:** 1800-8890-625 (Monday to Friday, 10:00 AM – 6:00 PM)
- **Turnaround Time (TAT):** acknowledgement with a Unique Case ID is generated as soon as the case is being taken under cognizance. Primary investigation and target resolution within 7 working days.

Level 2: Escalation to Grievance Redressal Officer (GRO)

Grievances unresolved at Level 1 or involving complex operational/legal disputes shall escalate to the designated GRO:

Officer Name: Ms. Babita Joshi

Designation: Grievance Redressal Officer

Email: grievance@xpressloan.in

Turnaround Time (TAT): Detailed review and resolution within 7 working days from the date of escalation.

Level 3: Escalation to Principal Nodal Officer (PNO)

Grievances unresolved at Level 2 shall escalate to the designated PNO:

Officer Name: Mr. Rahul Kumar Jha

Designation: Principal Nodal Officer

Direct Email: info@comero.in

Resolution Timeline: Final investigation and definitive decision within 14 working days (ensuring total internal processing time stays within 30 days).

4. Specific Provisions for Credit Information Reporting Grievances

In compliance with Chapter-V of the Reserve Bank of India (Non-Banking Financial Companies – Credit Information Reporting) Directions, 2025:

- **Regular Updation:** The Company shall submit borrower data to all four registered CICs (TransUnion CIBIL, Equifax, Experian, CRIF High Mark) at reference dates (9th, 16th, 23rd, and full file by the 5th of next month).
- **Dispute Rectification:** Upon receiving a credit report dispute from a customer or a CIC, the Company shall investigate, rectify inaccurate credit data, and update the CICs within a maximum of 30 calendar days.
- **Compensation Framework:** If the Company fails to rectify or update credit information within 30 calendar days of receiving a valid grievance without justifiable delay, the customer shall be entitled to compensation as per the RBI Framework for Compensation.

5. Mandatory Quality Control & Rejection Framework

To prevent improper or arbitrary rejection of customer complaints:

- **Mandatory GRO Sign-off:** Frontline agents or Level 1 support desks cannot summarily reject customer complaints. Any proposed resolution resulting in 'Wholly Rejected' or 'Partially Resolved' status must be formally reviewed and signed off by the Grievance Redressal Officer (GRO).
- **MIS Categorization:** Every grievance ticket received across all channels must be categorized and tracked in the Company's MIS under three standard heads: (i) Fully Resolved, (ii) Partially Resolved, or (iii) Wholly Rejected.

6. Reserve Bank - Integrated Ombudsman Scheme (RB-IOS)

While external escalation to the RBI Ombudsman does not apply due to your asset size, Level 3 (Principal Nodal Officer) serves as the apex authority for customer disputes, and the policy will automatically adopt full RB-IOS provisions once the ₹100 Crore threshold is met.

7. Governance, Board Oversight & Disclosures

- **Quarterly Board Reviews:** A structural report covering complaint receipt volume, category-wise breakdown, resolution TAT performance, rejection ratios, LSP/DLA conduct, and root-cause analysis shall be placed before the Board of Directors on a quarterly basis.
- **Annual Disclosures:** In alignment with RBI disclosure norms, a detailed summary table of customer complaints received, disposed of, rejected, and pending shall be included in the 'Notes to Accounts' accompanying the Annual Financial Statements.

8. Mandatory Policy Visibility

This Policy, along with the contact details of the Grievance Officer and Principal Nodal Officer, must be prominently displayed on:

1. The official corporate website www.comero.in
2. The Digital Lending Application / Platform www.xpressloan.in