GRIEVANCE REDRESSAL POLICY

Comprehensive NBFC and Digital Lending Governance Policy

Policy Code	ATFPL/GRM/2026-27/02
Version	1.0
Board Approval Date	31-07-2026
Effective Date	31-07-2026
Review Frequency	Yearly and event-based
Approving Authority	Board of Directors
Applicable Product / Channel	Askrupee
NBFC Status	Non-Deposit Taking Company – Investment Credit Company
Deposit Status	The Company is a non-deposit taking NBFC and does not accept public deposits.

ANSU TRADE & FISCALS PRIVATE LIMITED

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Document Control and Company Particulars

Regulatory References

- Reserve Bank of India (Digital Lending) Directions, 2025 and all subsequent amendments.
- Reserve Bank of India (Non-Banking Financial Companies - Responsible Business Conduct) Directions, 2025, updated directions and fair practices requirements applicable to NBFCs.
- RBI directions on Key Facts Statement, Annual Percentage Rate, penal charges, grievance redressal, outsourcing, recovery agents, credit information reporting, KYC/AML, cyber security and customer protection.
- Companies Act, 2013, Information Technology Act, Digital Personal Data Protection framework, Contract Act, consumer protection laws and any other applicable law.

In case of inconsistency between this Policy and any binding regulatory requirement, the stricter requirement shall apply automatically. Management shall place such inconsistency before the Board or authorised committee for formal amendment at the earliest feasible meeting.

Purpose and Philosophy

The purpose of this Policy is to establish a comprehensive, transparent, borrower-protective and regulator-ready framework for grievance redressal policy of ANSU TRADE & FISCALS PRIVATE LIMITED. The Policy is designed for digital lending through Askrupee, website publication, internal governance, LSP/DLA control, audit review and Board oversight.

This Policy is deliberately detailed so that business, compliance, technology, recovery, customer service, legal and audit teams can operate from a common control framework and avoid informal practices that may create regulatory, conduct, data, customer protection or reputational risk.

Applicability and Scope

- All directors, KMPs, employees and officers of the Company.
- All digital lending journeys, including Askrupee and any web/app/API channel.
- All outsourced service providers, LSPs, DLAs, collection agencies, technology vendors, call centres, API partners and processors.
- All borrowers, applicants, co-applicants, references and customer data subjects to the extent applicable.
- All loan lifecycle stages: marketing, application, KYC, underwriting, sanction, KFS, disbursement, servicing, repayment, collection, closure and complaint handling.

Complaint Channels

This section establishes detailed operating expectations for complaint channels under the ANSU TRADE & FISCALS PRIVATE LIMITED policy framework. It shall be implemented through SOPs, system controls, employee training, LSP contractual obligations and periodic compliance testing.

- Complaints may be received through app, website, email, phone, branch/corporate office, letter, LSP channel or regulatory portal.
- Every complaint shall receive acknowledgement with reference number.
- The Company shall ensure complaints against LSP/DLA are owned and resolved by the Company.
- A complaint shall not be closed merely because it was routed through an LSP.

Operational Procedure

TAT and Escalation

This section establishes detailed operating expectations for tat and escalation under the ANSU TRADE & FISCALS PRIVATE LIMITED policy framework. It shall be implemented through SOPs, system controls, employee training, LSP contractual obligations and periodic compliance testing.

- Acknowledgement should be prompt and final response should be provided within the regulatory/internal TAT.
- If complaint remains unresolved for 30 days or customer is dissatisfied, the customer may approach RBI Ombudsman/CMS.
- Root cause analysis shall be performed for recurring complaints.
- Complaint MIS shall be placed before management/Board at defined frequency.

Operational Procedure

GRO Display

This section establishes detailed operating expectations for gro display under the ANSU TRADE & FISCALS PRIVATE LIMITED policy framework. It shall be implemented through SOPs, system controls, employee training, LSP contractual obligations and periodic compliance testing.

- GRO details shall appear on website, app, KFS, loan agreement and important customer communication.
- Current GRO details: [● Nodal Grievance Redressal Officer name and designation]; [● GRO email, phone and address]
- RBI escalation details shall be displayed clearly.
- Working hours and escalation officer details shall be maintained: [● Escalation Officer details]

Operational Procedure

GOVERNANCE

Board Ownership

The Board shall own this Policy, approve material changes, monitor management implementation and ensure that the Company does not operate any product, channel or partner arrangement in a manner inconsistent with

RBI directions. The Board may delegate day-to-day monitoring to a committee or senior management; however, regulatory accountability remains with the Company.

Management Responsibility

Senior management shall convert this Policy into SOPs, process notes, system controls, maker-checker workflows, vendor obligations, employee training, audit programmes and exception reporting. Each business owner shall ensure that operational teams and LSPs follow the approved policy without informal deviations.

Three Lines of Defence

The first line shall operate the process, the second line comprising compliance/risk/legal shall independently review design and exceptions, and the third line comprising internal audit shall test adequacy and effectiveness. Material gaps shall be escalated with corrective action timelines.

Policy Review

This Policy shall be reviewed at least yearly and earlier upon any RBI circular, product change, technology change, LSP onboarding, adverse audit observation, material complaint trend, data incident or Board direction.

CUSTOMER

Customer-first Standards

All borrower communication shall be transparent, fair, non-misleading and in a language understood by the borrower. The customer shall not be pressurised through dark patterns, hidden charges, pre-selected options, forced consent or difficult exit flows.

Disclosure Standards

The Company shall disclose lender identity, NBFC status, non-deposit taking nature, product terms, interest, APR, fees, taxes, penal charges, cooling-off rights, grievance contacts, LSP/DLA involvement and repayment schedule before loan acceptance.

Consent Standards

Consent must be specific, informed, purpose-linked, revocable where permissible, separately recorded and preserved in a retrievable audit trail. Bundled consent or silence shall not be treated as valid consent for sensitive actions.

Vulnerable Borrowers

Teams shall exercise additional care for borrowers who appear distressed, financially vulnerable, digitally inexperienced, elderly or otherwise unable to understand consequences. Such borrowers shall not be pushed into repeat loans or refinancing merely for collection targets.

DIGITAL

Digital Lending App Governance

Askrupee and any other DLA shall be governed as a regulated digital lending interface of the Company. The app journey shall not misrepresent approval status, conceal charges, access prohibited device data or allow LSPs to control loan decisions outside Company-approved rules.

Fund-flow Control

Loan disbursement and repayment must flow directly between the Company and borrower/end-beneficiary except as expressly permitted. LSP pool accounts, pass-through accounts or informal collections are not permitted.

LSP Accountability

The Company remains responsible for outsourced activities. Every LSP shall be subject to due diligence, contract controls, customer conduct obligations, data processing restrictions, audit rights, complaint reporting, termination rights and periodic performance review.

Prohibited Data Access

The app shall not access contact list, call logs, file/media, telephony functions or other intrusive device resources. Any camera, microphone or location access shall be one-time or need-based, disclosed clearly and supported by consent.

RECORDS

Record Keeping

The Company shall maintain records of applications, KYC, bureau pulls, underwriting outputs, KFS, consent logs, sanction terms, disbursement, repayment, complaints, recovery actions, notices, settlement, closure and audit trails for the prescribed retention period.

Evidence Quality

Every important customer action shall be evidenced through timestamp, user identifier, IP/device metadata where lawful, document hash/version, OTP/e-sign trail, communication log and maker-checker approval as applicable.

MIS and Exception Reporting

Monthly MIS shall include loan volumes, pricing, complaints, TAT, recovery exceptions, LSP breaches, data incidents, cooling-off cancellations, NPA movement, write-offs, fraud alerts and regulatory exceptions.

Audit Readiness

Policies, SOPs, logs, Board approvals, contracts, training records, system screenshots and exception closures shall be maintained in a form suitable for statutory audit, internal audit, RBI inspection and management review.

Detailed Control Matrix

Regulatory Risk and Mitigation Register

SOP Checklist for Implementation

Approval Matrix

RBI-Safe Exclusion List

Pending Management Confirmation Register

Management Certification and Finalisation

This Policy is approved for use as a final policy framework. Yellow highlighted items shall be completed by management before external publication or operational reliance where such information directly affects customers, regulators, vendors or Board oversight.

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Deposit Status	The Company is a non-deposit taking NBFC and does not accept public depo

Legal Name	ANSU TRADE & FISCALS PRIVATE LIMITED
CIN	U65100WB1990PTC049122
RBI Certificate of Registration	B.05.03608
NBFC Category	Non-Deposit Taking Company - Investment Credit Company
Registered Office	EP-Y-16, Sector - V, Kolkata, Kolkata, West Bengal, India, 700091
Corporate Office	Plot No. 123, Street No. 17, MIDC, Marol, Andheri (E), Mumbai, Maharashtra,
Books of Account maintained at	Plot No. 123, Street No. 17, MIDC, Marol, Andheri (E), Mumbai, Maharashtra,
Website	[● Website URL to be inserted]
Customer Care	[● Customer care email and phone to be inserted]
Grievance Officer	[● Nodal Grievance Redressal Officer name and designation]
Grievance Contact	[● GRO email, phone and address]

Control Point	Minimum Standard	Owner	Frequency	Evidence
Governance owner identified	Required control	Business / Compliance / Technology as applicable	Monthly or event based	Policy, SOP, system log, screenshot, MI
Customer disclosure completed before consent	Required control	Business / Compliance / Technology as applicable	Monthly or event based	Policy, SOP, system log, screenshot, MI
Maker-checker approval applied	Required control	Business / Compliance / Technology as applicable	Monthly or event based	Policy, SOP, system log, screenshot, MI
Digital audit trail maintained	Required control	Business / Compliance / Technology as applicable	Monthly or event based	Policy, SOP, system log, screenshot, MI
LSP activity monitored	Required control	Business / Compliance / Technology as applicable	Monthly or event based	Policy, SOP, system log, screenshot, MI
Complaint impact assessed	Required control	Business / Compliance / Technology as applicable	Monthly or event based	Policy, SOP, system log, screenshot, MI
Data privacy and security control mapped	Required control	Business / Compliance / Technology as applicable	Monthly or event based	Policy, SOP, system log, screenshot, MI
Exception and breach escalation defined	Required control	Business / Compliance / Technology as applicable	Monthly or event based	Policy, SOP, system log, screenshot, MI
Board/committee reporting enabled	Required control	Business / Compliance / Technology as applicable	Monthly or event based	Policy, SOP, system log, screenshot, MI
Website/app publication requirement confirmed	Required control	Business / Compliance / Technology as applicable	Monthly or event based	Policy, SOP, system log, screenshot, MI

Risk	Rating	Mitigation
Mis-selling / inadequate disclosure	Medium/High	KFS, APR, terms, cooling-off and website disclosure befo
LSP misconduct	High	Due diligence, contract, training, monitoring and terminat
Data over-collection	High	Need-based data collection, no prohibited permissions, c
Coercive recovery	High	Approved scripts, agent training, complaint monitoring an
Wrong fund flow	Critical	Direct RE-borrower fund flow and reconciliation
Unapproved pricing/charges	High	Board-approved pricing grid and KFS validation
Unresolved grievances	High	30-day escalation and RBI Ombudsman disclosure

Particular	Policy position / control requirement

Policy owner	Compliance / Business Head as relevant
Recommending authority	Managing Director / CEO / Compliance Head
Approving authority	Board of Directors
Review cycle	Yearly and event-based
Exception approval	Board / authorised committee, with reasons recorded

Particular	Policy position / control requirement
No public deposit acceptance	Website and app must not imply deposit acceptance.
No RBI endorsement statement	RBI registration cannot be shown as product approval.
No LSP fee from borrower	LSP fee shall be paid by the Company.
No prohibited mobile data	No contacts, call logs, file/media or telephony access.
No coercive recovery	No threats, harassment, public shaming or misleading criminal consequences
No automatic limit increase	No limit enhancement without borrower request and assessment.

Particular	Policy position / control requirement
Website URL	[● Website URL to be inserted]
Customer care details	[● Customer care email and phone to be inserted]
GRO details	[● GRO email, phone and address]
LSP/DLA list	[● LSP/DLA partner name(s), if any, to be inserted]
APR/ROI	[● ROI/APR range to be inserted]
Fees and penal charges	[● Processing fee and other charges to be inserted]; [● Penal charge structur
Cooling-off period	[● Cooling-off/look-up period to be inserted after Board approval]
CIMS status	[● Management to confirm CIMS reporting status for Askrupee DLA; if app qu

Particular	Name/Designation	Signature/Date
Prepared by	Compliance / Legal	
Reviewed by	Senior Management	
Recommended by	Managing Director / CEO	
Approved by	Board of Directors	