

# Grievance Redressal Policy

## Version 2.0

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**DOCUMENT CONTROL PAGE**

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<b>Distribution List</b>	:	Relevant employees, Customers and stakeholders of Paul Merchants Finance Private Limited, any third party including Contractors, subcontractors and Vendors to the extent applicable.

**Issue / Revision History**

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1.0	Grievance Redressal Policy	Compliance Department	Operations Head	Board of Directors	22/10/2025
2.0	Grievance Redressal Policy - Update	Compliance Department	Operations Head	Board of Directors	23/06/2026

## 1. Introduction

To foster a culture of transparency and trust, Paul Merchants Finance Private Limited (“**PMFPL**” or “**Company**”) have put in place a grievance redressal mechanism, which is formalised through a Grievance Redressal Policy (“**Policy**”). This Policy aims to create a safe and secure environment wherein all stakeholders can confidently raise concerns regarding any unacceptable practices or unethical behaviour. It provides a clear framework for responsible reporting and ensures that grievances are addressed effectively by the Company’s management.

While this Policy outlines Company’s approach for handling grievances, it does not absolve the company personnel from upholding the expected standards of conduct as outlined in the Code of Conduct.

## 2. Applicability

This Policy applies to all Customers, employees and other stakeholders.

## 3. 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:

“**Applicable Laws**” means all applicable laws, statutes, enactments, Acts of Central or State legislature, ordinances, rules, regulations, notifications, guidelines, directions, directives, policies, circulars, decisions and any other pronouncements issued in accordance with the Companies Act, the RBI Master Directions or any other law applicable to the jurisdiction of India by any Central, State, local, or other governmental, administrative or regulatory authority exercising executive, legislative, judicial, regulatory or administrative functions of or pertaining to the government.

“**Board**” means the Board of Directors of PMFPL.

“**Companies Act**” means The Companies Act, 2013, and rules and regulations issued thereunder, as amended from time to time.

“**Customer**” means a user of the financial services and products, including lending provided by PMFPL.

“**Grievance**” means any complaint, dispute, disagreement by a Customer arising as a result of and / or relating to the services and products provided by PMFPL.

“**Grievance Redressal Mechanism**” is the internal grievance redressal platform of PMFPL for

addressing and resolving complaints received from its Customers.

**“Grievance Redressal Policy”** means this grievance redressal process document adopted and implemented by PMFPL, as may be amended from time to time.

**“GRO”** means the Grievance Redressal Officer.

#### **4. Purpose:**

The purpose of the policy is to ensure that:

- All customers are treated fairly and without any bias at all times.
- All issues raised by customers are dealt with courtesy and resolved on time.
- Customers are made completely aware of their rights so that they can opt for alternative remedies if they are not fully satisfied with response or resolution to their complaint.

#### **5. Complainant- Role, Rights and Duties**

- The Complainant serves as a reporting party presenting genuine grievance.
- The Complainant has a right to be informed about the status of his / her / their complaint and final decision made by the Company.
- The Complainant will be informed of the process for lodging a complaint, the appropriate authority to whom it should be addressed, the manner in which it should be submitted, and the expected timeline for its resolution.
- The Complainant is responsible for providing all necessary / relevant information and extending full support to grievance redressal platform of the company.

#### **6. The Guiding Principles**

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

- have a system and a procedure for receiving, registering and disposing of complaints and grievances.
- have appropriate grievance redressal mechanism within the organization to resolve complaints and grievances. Such mechanism should ensure that all disputes arising out of the decisions of the Company’s functionaries are heard and disposed of in a fair, transparent and time bound manner.

#### **7. Exclusions**

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

- Complaints that are Illegible.
- Complaints those are trivial or frivolous in nature.

- Matters which are pending before a court/ judicial forum, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body.
- Any complaint lodged beyond the applicable Limitation Period.

## **8. Principles Governing Grievance Redressal Mechanism**

8.1 Though PMFPL would always endeavour to work towards full customer satisfaction, The principles governing the Grievance Redressal Mechanism are as follows:

- a. to establish a robust Grievance Redressal Mechanism for PMFPL;
- b. to constantly upgrade, devise newer and smarter mechanisms to receive and redress Grievances;
- c. to guide and enable all employees of PMFPL to work in good faith and without prejudice to the interests of the Customers;
- d. to prioritize redressal of Grievances of Customers with disabilities;
- e. to redress the Customer's Grievances arisen on account of services provided by any outsourced agency;
- f. to deal with all Grievances in a prompt, efficient, timely and courteous manner;
- g. to treat all Customers fairly at all times;
- h. to keep the Customer informed about the mechanism to address their complaints, concerns and grievances within PMFPL; and
- i. to analyze and implement the feedback received from Customers on a continuous basis.

8.2 Redressal of Grievances of a Customer with disabilities will be prioritized once a formal request is made and proof of disability is furnished by such Customer.

8.3 A consolidated report of all reviews conducted under the Grievance Redressal mechanism shall be submitted to the Board at such regular intervals, as specified by it or required under Applicable Laws.

## **9. Filing of Complaints and Escalation Procedure for Unresolved Complaints:**

A person with a grievance, complaint, or feedback regarding the products and services offered by PMFPL or its outsourced agencies may contact the PMFPL's Customer Service/Care Department through any of the following channels.

**Level-1:** Customer Care: Complainant may first raise any query or complaint by contacting our Customer Care team at "18001371333" or Email "info@paulmerchants.net". A written acknowledgment will be sent within 48 hours and resolution attempted within 7 working days.

**Level-2:** Grievance Redressal Officer (GRO): If the Complainant is not satisfied with the response, he / she may escalate the issue to the Grievance Redressal Officer, Paul Merchants Finance Private Limited, at Email "gro@paulfinicap.com" Address "First Floor, SCO 827-828, Sector-22A, Chandigarh, India – 160022". The GRO will endeavour to resolve the matter within 8 working days.

**Level-3:** Principal Nodal Officer: If the Complainant remains unsatisfied or no reply is received they may write to the Principal Nodal Officer, Email “pno@ paulfincap.com”. PNO will endeavour to resolve the matter within 15 working days.

**RBI Ombudsman:** Complainant can further escalate under the Reserve Bank–Integrated Ombudsman Scheme, 2021 through <https://cms.rbi.org.in> or the RBI Ombudsman for the relevant jurisdiction.

The Borrower may also refer to the Grievance Redressal Mechanism Policy, which is uploaded on the company website: [www.paulmerchantsfin.com](http://www.paulmerchantsfin.com).

#### **10. Timelines / Turn Around Time (TAT)**

The Company shall endeavour to resolve the complaint as expeditiously as possible. However, the maximum timeline for such resolution shall ordinarily not exceed as mentioned in Para-9.

If the Complaint is not resolved or if the Complainant is not satisfied with the response of the Company, the Complainant may lodge or escalate their Complaint to the RBI Ombudsman on RBI CMS portal <https://cms.rbi.org.in>. Complaints in electronic mode (e-mail to [crpc@rbi.org.in](mailto:crpc@rbi.org.in)) and physical form, including postal and hand-delivered Complaints, shall be addressed and sent to the place where the Centralized Receipt and Processing Centre of the Reserve Bank is established, for scrutiny and initial processing.

Alternatively, the Complainant may also approach the Officer-in-Charge of the Regional Office of the Department of Supervision of RBI.

#### **11. Mandatory display at the offices and website of the Company**

At the operational level, the Company shall display the following information prominently, for the benefit of its customers, at its every place of business:

- i. the name and contact details (Telephone / Mobile nos. / email address) of the Grievance Redressal Officer who can be approached by the customer for resolution of complaints against the Company.
- ii. The Company shall also upload the copy of Grievance Redressal Policy on its website [www.paulmerchantsfin.com](http://www.paulmerchantsfin.com).

#### **12. Sensitizing operating staff for improvement in service & handling complaints**

The Company deals with customers, investors, stakeholders and third-party service providers from different segments, which may give rise to difference of opinion and areas of friction. The Company understands the importance of sensitizing staff to handle customer, employee, investor and third party service provider complaints / grievances with courtesy, empathy and promptness. The Company shall also conduct training programs regularly for staff on customer services and minimizing grievances. Imparting soft skills required for handling customers, would be an integral part of the training programs.

**13. Review of the Grievance Redressal Mechanism and Reporting**

This Grievance Redressal Policy shall be reviewed annually or on more frequent basis, if required, by the Board of Directors.

**Sd/-**

**Chairman**