

RDA HOLDINGS PRIVATE LIMITED
CUSTOMER GRIEVANCE REDRESSAL POLICY

1. BACKGROUND

RDA Holdings Private Ltd (the "Company"/ "RDA"), was incorporated on 27th day of February 1982 as Private Limited Company under the provisions of Companies Act, 1956. The Company is a Non-Deposit taking Systemically Importance Core Investment Company ("CIC-ND-SI") registered with the RBI vide certificate No. N-13.02289 dated 19th November, 2018.

The Reserve Bank of India ["RBI"] has, under the Reserve Bank of India Act, 1934 ["RBI Act"], issued the Core Investment Companies (Reserve Bank) Directions, 2016 ["the CIC Directions"].

The primary objective of the Company is to make equity investments and to hold investments in its Subsidiaries and Group Companies in accordance with the directions of Board of Directors.

The Board of RDA has resolved that the Company does not hold any public fund and will not accept the same in the future without prior approval of Reserve Bank of India. The Board has also resolved that the Company will not be lending to Group companies without prior approval of Reserve Bank of India. Further, the Company does not have any customer interface and will not have any customer interface in the future without prior approval of Reserve Bank of India. Presently, the Company is not in the business of giving loans and neither has any plan for the same. The Company operates within the ambit of making investment in group companies and its business model does not transmit any risks, there being no lending activities nor any customer interface.

However, keeping in view any probable future activities of this nature, the Company has framed this Policy setting out the procedure for receiving, registering and disposing of the complaints and grievances of the Customers with respect to the products and services of the Company ("Complaints"), including but not limited to the Complaints in relation to the services provided by the third party agents or business facilitators appointed by the Company for providing such services on behalf of the Company.

This Policy aims to provide a framework to deal with the Complaints of the Customers in a fair and transparent manner and educate the Customers about the processes to be followed to lodge a Complaint with the Company and/or the RBI.

1. Purpose:

The purpose of the Policy is to ensure that:

- a) the Customers are treated fairly and without bias, at all times.
- b) the Complaints raised by the Customers are dealt with courtesy and resolved in a timely manner.
- c) the Customers are informed of the avenues to escalate their Complaints within the Company.
- d) the Customers are informed of their rights so that they can opt for alternative remedies if they are not fully satisfied with the Company's response or resolution to their Complaints.

2. Process of Grievance Redressal:

The Customers who have any Complaint, can follow the following process for its redressal:

Primary Level:

The Customers who intend to file a Complaint, may file their Complaint with the Company by using any of the following channels between 10:00 am to 6:00 pm on any working day of the Company and furnishing complete details in relation to such Complaint:

- a) Register the Complaint in a complaint register which is available at the registered office of the Company;
- b) Email at avinash@rdaholdings.com (Avinash Marathe, Chief Compliance Officer)
- c) Call on 020-26158158
- d) Write to the Company at the below mentioned address:
501, 5th Floor, Marvel Alaina,
Koregaon park, Pune 411001.
Kind Attention: Customer Service Team

Escalation Matrix:

Level 1:

In case, the Complaint is not resolved within 7 (Seven) working days from the date of filing of the Complaint or the Customer is not satisfied with the response, or the resolution provided to the Customer at Level – 1, the Customer may escalate the Complaint to:

- a) Email at vap@rdaholdings.com (Vasant Potbhare, Chief Executive Officer)

Level 2:

In case, for the NBFC related complaints the Customer is not satisfied with the response, or the resolution provided to it or the Complaint is still not resolved within the period of 21 (Twenty- One) working days from the date of the Complaint, the Customer may appeal to NBFC Ombudsman at:

Address of NBFC Ombudsman	
C/o Reserve Bank of India, RBI Byculla Office Building, Opp. Mumbai Central Railway Station, Byculla, Mumbai - 400 008 Email: nbfcomumbai@rbi.org.in	C/o Reserve Bank of India Sansad Marg, New Delhi - 110001 STD Code: 011, Tel. No. 23724856 Fax No. 23725218 - 19 Email: nbfconewdelhi@rbi.org.in

3. Redressal of the Complaints:

- a) The Customers are advised to file the Complaint by furnishing complete details of

the same to the Company.

- b) Upon receipt of the Complaint by the Company, the acknowledgement along with a complaint identification number and the details of the designated officer, who will be dealing with the Complaint, shall be provided to the Customer within 3 (Three) working days from the date of receipt of such Complaint.
- c) The Company shall provide the necessary clarification / justification with respect to the Complaint, to the satisfaction of the Customer and take all appropriate measures to resolve the Complaint within 30 (Thirty) working days from the date of receipt of such Complaint.
- d) In case any additional time is required for resolution of the Complaint, the Company shall inform the Customer about the requirement of such additional time along with the expected timelines for the resolution of such Complaint.
- e) The Chief Executive Officer and the Head of Operations of the Company shall ensure that all Complaints filed by the Customers are resolved within the stipulated time frame.
- f) A record of all Complaints filed by the Customers and the response or resolution provided by the Company shall be maintained by the Company as per the Company's policy formulated for document preservation and archival.

4. General:

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company from time to time.

5. Review:

- a) This Policy is subject to review by the board of directors of the Company as and when deemed necessary. The board of directors of the Company shall annually review the functioning of the grievance redressal mechanism.
- b) This Policy shall be subject to the applicable laws including but not limited to the rules, regulations, guidelines, directives and instructions issued by the RBI, from time to time and shall supersede the earlier version of the Policy. Any change/amendment in applicable laws with regard to maintenance of an appropriate grievance redressal mechanism shall be deemed to be incorporated in this Policy by reference and this Policy shall be deemed to have been amended and revised accordingly.

The above policy has been approved by the Board of Directors in its meeting held on 22nd March 2023.