

**Upmove Capital Private Limited**  
**Fair Practice Code & Customer Grievance Redressal Policy**



**Version 3.0**

**2024**

**Document Approval**

<i>Version</i>	<i>Particulars</i>	<i>Board of Directors Meeting Date</i>
<b>1</b>	This Policy has been reviewed and approved by Board of Directors	11 May 2020
<b>2</b>	Grievance Redressal Policy has been revised by Board of Directors	05 September 2022 (RBC)
<b>3</b>	Grievance Redressal Policy has been revised by Board of Directors	20 May 2024 (RBC)

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### **Fair Practice Code**

Pursuant to Reserve Bank Of India guideline on Fair Practice Code (FPC) to be followed by NBFC's vide letter no. RBI/2011-12/470; DNBS.CC.PD.No.266/03.10.01/2011-12 March 26, 2012 and thereafter vide its latest circular bearing No. RBI/2012-13/416 – DNBS CC PD No. 320/03 .10.01/2012-13 dated February 18, 2013 and thereafter vide its latest circular bearing No. RBI/2015-16/16 - DNBR (PD) CC.No.054/03.10.119/2015-16 dated July 01, 2015, Upmove Capital Private Limited has formulated this FPC and laid down following processing /practices for business transactions.

1. **Loan application:**

Upmove Capital Private Limited will communicate to the borrower in the vernacular language or a language as understood by the borrower. Loan application includes all necessary information which affects the interest of the borrower. The loan application form gives the documents required to be submitted with the application form. Upmove will have a system of giving acknowledgement for receipt of all loan applications. Preferably, the time frame within which loan applications will be disposed of shall also be indicated in the acknowledgement.

2. **Loan appraisal and terms/conditions and Key Facts Statement for Loans and Advances**

Upmove will provide a sanction letter to borrower in the vernacular language or a language as understood by the borrower. Sanction letter includes annualised rate of interest, loan repayment schedule, collateral information, processing fees, penalty charges for late payment in bold etc.,

Upmove shall comply with the instructions related 'Key Facts Statement (KFS) for Loans & Advances', and penal charges as amended from time to time

The copy of all documents will be furnished to the Borrower.

3. **Disbursement of loans including changes in terms and conditions:**

Upmove will send communication to each borrower, any change in terms and conditions of the loan including disbursement schedule, interest rates, service charges, prepayment charges etc. Changes with respect to interest rates will be effected prospectively.

Upmove will release all securities on repayment of all dues or on realisation of the outstanding amount of loan subject to any legitimate right or lien for any other claim, Upmove may have against borrower. If such right of set off is to be exercised, the borrower shall be given notice about the same with full particulars about the remaining claims and the conditions under which Upmove are entitled to retain the securities till the relevant claim is settled/ paid.

4. **General:**

Upmove will refrain from interference in the affairs of the borrower except for the purposes provided in the terms and conditions of the loan agreement (unless information, not earlier disclosed by the borrower, has been noticed).

Upmove shall not discriminate in extending products and facilities including to physically/visually challenged applicants on grounds of disability.

5. Recovery:

In the matter of recovery of loans, the Upmove will not resort to undue harassment viz; persistently bothering the borrowers at odd hours, use muscle power for recovery of loans etc. Complaints from customers also include rude behaviour from the staff of the Company. Upmove staff will be adequately trained to deal with the customers in an appropriate manner.

## **Policy on Grievance Redressal Mechanism**

### **1. Introduction**

The customer centricity is the core objective of the Upmove Capital Private Limited (hereinafter referred to as 'the Company' or 'Upmove' or 'We' or 'Us'). The customer complaints constitute an important voice of customer and our policies and redressal mechanism aims at laying down the framework for minimising and resolving customer grievances through proper redressal mechanism.

The Grievance Redressal Policy has been formulated in accordance with the Reserve Bank of India's (RBI) Master Direction – Non-Banking Financial Company – Non-Systematically Important Non-Deposit taking company (Reserve Bank) Directions, 2016, updated from time to time. The policy is duly approved by the Company's Board of Directors.

### **2. Purpose/Key Commitments**

The Company's key commitments towards its customers are:

1. Customer shall be treated fairly in all times.
2. Complaints raised by customers shall be dealt with courtesy and resolved in a timely manner.
3. Customers shall be informed of avenues to escalate their complaints within the organization, and their rights in cases when their complaints are not resolved in a timely manner or when they are not satisfied with the resolution of their complaints.

Importantly, we take the privacy and dignity of our customers very seriously, and treat our customers fairly and in a courteous manner at all time.

### 3. Grievance Redressal Process

**Level-I** In order to effectively understand and address customer grievances, the Company shall open multiple channels of communication as follows:

#### 1. Email:

Customers have the option of sending their queries/complaint including FinTech/ digital lending/Co-lending related complaints/ issues through email to [contact@upmove.in](mailto:contact@upmove.in)

#### 2. Visit to our office at the address mentioned below:

UPMOVE CAPITAL PRIVATE LIMITED

Indiqube Gamma, No.293/154/172, 3rd Floor, Outer Ring Road, Kadubeesanahalli. Bengaluru Bangalore KA 560103

#### 3. When to expect a response

After a customer has filed a complaint through one of the channels above, he/she should expect to receive an acknowledgement/response within 7 working days from the date of registering the complaint. The Company shall also provide suitable justification in case the complaint resolution requires more than the stipulated time.

### Level II

#### Addressing or handling of Complaints

In case the complaint is not resolved within the specified timeframe or the customer is not satisfied with the resolution provided, he/ she may contact the Company's Grievance Redressal Officer. The name and contact details of the Grievance Redressal Officer is as under:

<b>Designation</b>	Grievance Redressal Officer
<b>Name</b>	Mr. Madan HM
<b>Contact No.</b>	+91 9148380504
<b>Email ID</b>	<a href="mailto:grievanceredressalofficer@upmove.in">grievanceredressalofficer@upmove.in</a>
<b>Address</b>	Indiqube Gamma, No.293/154/172, 3rd Floor, Outer Ring Road, Kadubeesanahalli. Bangalore KA 560103

After examining the grievance, the Grievance Redressal Officer will send the final response within 7 working days of the receipt of the complaint/ grievance received by Grievance Officer. During this time, customers can write in to us to check on the status of their grievance, and we will endeavor to respond to them as quickly as possible.

The call facility is available from 10:00 a.m. to 18:00 p.m. (Monday to Friday) and 10:00 a.m to 17:00 p.m. on Saturdays, except public holidays.

### Level III

If the Customer is not satisfied with the resolution received from the above channels, or if the Customer does not hear within the above specified timeframe, the Customer can contact the following channel:

<b>Designation</b>	Principal Nodal Officer
<b>Name</b>	Ms. Apeksha Gudhaka
<b>Contact No.</b>	+91 9739293231
<b>Email ID</b>	principal.nodal.officer@upmove.in
<b>Address</b>	Indiqube Gamma, No.293/154/172, 3rd Floor, Outer Ring Road, Kadubeesanahalli. Bangalore KA 560103

The call facility is available from 10:00 a.m. to 18:00 p.m. (Monday to Friday) and 10:00 a.m. to 17:00 p.m. on Saturdays, except public holidays.

After examining the grievance, the Principal Nodal Officer will send the final response within 15 working days of the receipt of the complaint/ grievance received by Grievance Officer. During this time, customers can write in to us to check on the status of their grievance, and we will endeavor to respond to them as quickly as possible.

### Level IV

#### Complaints to Ombudsman

If the Grievance is not redressed within 30 days, or if the Borrower is not satisfied with the response so received, a complaint may be filed online on <https://cms.rbi.org.in>. Complaints can also be filed through the dedicated e-mail or sent in physical mode to the 'Centralised Receipt and Processing Centre' set up at Reserve Bank of India, 4th Floor, Sector 17, Chandigarh - 160017 in the format prescribed under the Ombudsman scheme which is available in Upmove's website under compliance disclosures. The process, complaints which maintainable and which are not maintainable etc all details in this regard may be referred from scheme aforesaid disclosed. A copy of the Ombudsman Scheme is available on the website of the Reserve Bank of India at [www.rbi.org.in](http://www.rbi.org.in) and also with our Nodal Officer.

#### 4. Supervision and Reporting

Upmove makes sure that best in class Customer Redressal Mechanism are in place to ensure timely resolution of the customer grievances. The system captures the complaints; follows turnaround time (TAT) based on the nature of the query and escalates issues based on predefined TAT.

Once captured in the CRM system the Customer support team is responsible for resolution of complaint/grievance to the customer's satisfaction. Every attempt is made to offer the customer suitable and appropriate alternate solutions wherever possible. However if the

customer continues to remain dissatisfied with the resolution, he can escalate the issue through the grievance redressal mechanism as referred above.

**5. Mandatory Display Requirements**

The company shall display this policy and other relevant details as required prominently, for the benefit of its customers, at all places where business is transacted:

**6. Reporting to Board of Directors**

The summary of the Customer grievance report along with a status report indicating the actions taken for resolution of the Communication, shall be placed before the Board of Directors for their review on a periodic basis but atleast on an annual basis.

**7. Policy Revision**

The Grievance Redressal Officer will review and assess the adequacy of this Policy in line with the RBI updates on an annual basis. It will be brought to the Board of Directors for review and approval, as and when any changes are required. The developments/ changes, if any shall be communicated to the customers and relevant stakeholders as and when necessary.

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END

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