



Customer Grievance Redressal Policy



Version History

| Version # | Issue Date | Prepared By | Reviewed & Approved By |
|-----------|------------------|---------------------|------------------------|
| 1.0 | April 01, 2010 | Mr. Vilas Palanat | Mr. Ramesh Mohite |
| 1.1 | April 01, 2021 | Mr. Vilas Palanat | Mr. Ramesh Mohite |
| 1.2 | December 7, 2023 | Mr. Rupak Mehendale | Mr. Jimmy Bharucha |

Document Distribution List

| Organization | Official (Name) | Designation | Purpose |
|---|--------------------|---|---------|
| Ebix Payment Services P Ltd. | Mr. Jimmy Bharucha | Chief Grievance Officer & Nodal Officer | Review |
| This policy is approved by the Customer Grievances Redressal Working Group under supervision by the Board of Directors. The policy will be reviewed as and when there is any material change required in the policy | | | |

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CUSTOMER GRIEVANCE REDRESSAL POLICY

PREAMBLE

Ebix Payment Services Pvt. Ltd., being a service organization strives hard to give excellent service to its customers for sustained business growth. Addressing grievances of customers is an inherent part of any service oriented corporate entity. For EbixCash, customer satisfaction is paramount and therefore the company believes in providing efficient service to its customers. In order to efficiently handle customer complaints, the company has three pronged strategies as mentioned below:

1. Proper and prompt service delivery
2. Prompt Redressal of customer grievances.
3. Review mechanism in case of escalated complaints

Ebix Payment Services Business under its brand name, "EbixCash"

Ebix Payment Services Private Limited ("the Company") is engaged in the following three businesses:

1. Third Party Transaction processing and Logistic Support:
 - a. Providing Technical Support Service to the entities, which issue its own closed prepaid instruments.
 - b. Providing logistic support for use of Company's Sales & Distribution channel for selling cards along with Technical Support Service(Note: This segment is not governed by the PSS Act and the RBI Guidelines).
2. Franchisee Business: Appointing Franchisees for collecting cash/payments from customers of various entities and government bodies which have tied up with EbixCash to facilitate payment of bills, booking rail and air tickets, payment of utility bills etc. by giving a Franchisee Account named as ICW Franchisee Business Account.

(Note: The business of collecting cash through Franchisees on behalf of specific organizations and under authorization from these organizations is not governed by the RBI Guidelines)

In this segment Ebix Payment Services also acts as a BBPOU (Bharat Bill Payment Operating Unit).

- The Bharat Bill payment system is a RBI conceptualized system driven by NPCI. It is a one-stop ecosystem for payment of all bills providing an interoperable and accessible "Anytime Anywhere" Bill payment service to all customers across India with certainty, reliability and safety of transactions.
- It has multiple modes of payment and provides instant confirmation of payment via an SMS or receipt. The transaction can be initiated through Internet Banking, Mobile-Banking, Mobile Wallets, Kiosk, ATM, Bank Branch, Agents and Business

Correspondents, by just locating the Bharat Bill Pay logo. It offers myriad Bill collection categories like electricity, telecom, DTH, gas, water bills, etc. and also other repetitive payments like insurance premium, mutual funds, school fees, institution fees, credit cards, fastag recharge, local taxes, housing society payments, etc. at one single window. An effective mechanism for handling consumer complaints has also been put in place to support consumer regarding any Bill related problems in Bharat Bill Pay.

3. Semi-Closed prepaid payment instrument business: Issuance of multipurpose prepaid instruments as a payment option alternative to cash for large segment of population in the country that is unable to use e-payment facility since they do not have debit /credit cards.

(Note: Semi-Closed prepaid instruments business is governed by the PSS Act and the RBI Guidelines).

The Company is India's first ever "Multi-purpose Prepaid Instruments Company" and the leader in this segment. It offers safe and easy payment option to every customer for seamless transactions across M-Commerce and E-Commerce domains. The Company has introduced multi-purpose prepaid instruments of various denominations (known as "EbixCash Cards") which can be used to purchase various goods and services Online/On-mobile/IVRS from affiliated merchants based on "anywhere-anytime" concept, which would result in increased sales for all affiliated merchants, safety, and convenience for the customer. The Company is helping business organizations to expand markets by supporting sales channels convergence with its payments options.

As a service provider industry, customer service and customer satisfaction are the prime concerns of the Company and the object of this policy is to minimize instances of customer complaints through proper service delivery and review mechanism and prompt Redressal of various types of customer complaints.

The Company is in the business of issuance of Semi-Closed prepaid instruments and is authorized by the Reserve Bank of India (RBI) to operate a Payment System. It is governed by the Payment and Settlement Systems Act, 2007 ("the PSS Act"), Regulations made there under and the Issuance and Operation of Prepaid Payment Instruments in India (Reserve Bank) Directions, 2009 ("the RBI Guidelines") laid down by the RBI.

As regulatory requisites, the Company has developed a procedure for promptly attending to grievances of the customers in respect of various issues pertaining to EbixCash prepaid instrument as online payment mode. This is done by setting up of an internal three-tier system in the form of "Customer Care Centre" and a grievance Redressal mechanism in the form of "Customers Grievance Redressal Working Group", as hereinafter provided.

POLICY

- 1) This Policy is called the “Customers Grievance Redressal Policy”.
- 2) It shall apply to the business of the Company in India.
- 3) Policy comes into force from 1st day of April 2010, & as amended from time to time, thereafter.
- 4) It shall apply only to Semi-closed prepaid instrument business as mentioned above.
- 5) It is available on the website of the Company www.EbixCash.com under legal documents folder.
- 6) This policy is applicable to customer complaints as well as the general queries raised by customers

Section 1 – Definitions

- a) **‘Company’** shall mean Ebix Payment Services Pvt. Ltd. which is carrying on the business of issuance of Prepaid Payment Instruments, payment processing, payment collection and related services by facilitating payment solutions to the Customer for buying goods and services through any digital /electronic medium.
- b) **‘Complainant’** shall mean the Customer who has a Grievance against the service or product of the company.
- c) **‘Customer’** shall mean the holder and/or user of EbixCash Prepaid Instruments and/or any of the system participants of the Company.
- d) **‘Grievance’** shall mean communication in any form by a customer that expresses dissatisfaction about an action or lack of action by, or about the standard of service of the Company and/or its representative, in relation to use of EbixCash Prepaid Instruments. It includes any general queries by the customer also in the normal course of business.
- e) **‘EbixCash Prepaid Instrument’** shall mean the activated and valid Semi-closed prepaid instruments of various denominations and all variants of the same issued by the Company.
- f) **‘Payment System’** means a system that enables payment to be effected between a payer and a beneficiary involving clearing, payment or settlement service or all of them but does not include a stock exchange.
- g) **‘Query’** means a question, especially one expressing doubt or requesting information related to EbixCash services.
- h) **‘Redressal’** shall mean the final disposal of the Grievance of the Complainant by the Company.
- i) **‘System Participant’** shall mean Bank or any other person participating in a payment system and includes the system provider as per the PSS Act.
- j) **‘System Provider’** shall mean a person who operates and authorizes payment system.
- k) **‘Week’** shall mean consecutive seven Working Days.
- l) **‘Working Day’** shall mean any day (other than Sunday or Public Holiday) on which the Company’s Corporate Office is open for business.
- m) **“Financial Consumer Protection”** (FCP) refers to the fair and responsible treatment of, and prevention of harm to the financial consumers. Broadly, effective financial consumer protection entails the framework of laws and regulations designed to protect

consumers, oversight bodies with the necessary authority and resources to carry out their mission, fair treatment of consumers, proper disclosure, responsible Business conduct by financial service providers and intermediaries' and access to complaints handling and redress mechanisms. Definition Financial consumer protection (refers

Section 2 – Principles Governing Company's policy

The Company's policy on grievance redressal is governed by the following principles:

- 1) Customer shall be treated fairly at all times.
- 2) Complaints raised by customers shall be attended with courtesy and in time.
- 3) Customers shall be fully informed of avenues for grievance redressal within the organization and their right to approach the Customers Grievance Redressal Working Group in case they are not fully satisfied with the response of the Customer Care Centre.
- 4) The Company's Officer-in-Charge of Customer Care Centre must work in good faith keeping in mind this policy of the Company.
- 5) Limiting liability of customers in unauthorized electronic payment transactions in PPIs issued
 - a. For the purpose of this, electronic payment transactions to be divided into two categories:
 - i. Remote / Online payment transactions: Transactions that do not require physical PPIs to be presented at the point of transactions e.g. wallets, card not present (CNP) transactions, etc.; and
 - ii. Face-to-face / Proximity payment transactions: Transactions that require physical PPIs to be present at the point of transactions e.g. transactions at ATMs, PoS devices, etc.
 - b. Reporting mechanism for unauthorized payment transactions by customers:
 - i. Customers to mandatorily register for SMS alerts and wherever available register for e-mail alerts, for electronic payment transactions.
 - ii. The SMS alert for any payment transaction in the account shall mandatorily be sent to the customers and e-mail alert may additionally be sent, wherever registered. The transaction alert should have a contact number and / or e-mail id on which a customer can report unauthorized transactions or notify the objection.
 - iii. Customers shall be advised to notify the non-bank PPI issuer of any unauthorized electronic payment transaction at the earliest and, shall also be informed that longer the time taken to notify the non-bank PPI issuer, higher will be the risk of loss to the non-bank PPI issuer / customer.
 - iv. Customers to be facilitated with 24x7 access via website / SMS / e-mail / a dedicated toll-free helpline for reporting unauthorized transactions that have taken place and / or loss or theft of the PPI.

- v. Further, a direct link for lodging of complaints, with specific option to report unauthorized electronic payment transactions shall be provided by non-bank PPI issuer on mobile app / home page of its website / any other evolving acceptance mode.
- vi. The loss / fraud reporting system so established shall also ensure that immediate response (including auto response) is sent to the customers acknowledging the complaint along with the registered complaint number. The communication systems used by non-bank PPI issuer to send alerts and receive their responses thereto shall record time and date of delivery of the message and receipt of customer's response, if any. This shall be important in determining the extent of a customer's liability. On receipt of report of an unauthorized payment transaction from the customer, non-bank PPI issuer shall take immediate action to prevent further unauthorized payment transactions in the PPI.

6) CUSTOMERS LIABILITY

- a) A customer's liability arising out of an unauthorized payment transaction will be limited to ZERO.
- b) In case of contributory fraud / negligence / deficiency on the part of the non-bank PPI issuer, (irrespective of whether or not the transaction is reported by the customer), the maximum liability of customer to be ZERO.
- c) Third party breach where the deficiency lies neither with the non-bank PPI issuer nor with the customer but lies elsewhere in the system, and the customer notifies the non-bank PPI issuer regarding the unauthorized payment transaction. The per transaction customer liability in such cases will depend on the number of days lapsed between the receipt of transaction communication by the customer from the non-bank PPI issuer and the reporting of unauthorized transaction by the customer to the non-bank PPI issuer:
 - i. ZERO if within 3 days
 - ii. Transaction value or ₹10,000/- per transaction, whichever is lower if within four to seven days
 - iii. As per the approval of the IO of the company if beyond seven days
- d) In cases where the loss is due to negligence by a customer, such as where he / she has shared the payment credentials, the customer will bear the entire loss until he / she reports the unauthorized transaction to the non-bank PPI issuer. Any loss occurring after the reporting of the unauthorized transaction shall be borne by the non-bank PPI issuer. The company may however, at its discretion, decide to waive off any customer liability in case of unauthorized electronic payment transactions even in cases of customer negligence.

Note: The number of days mentioned above shall be counted excluding the date of receiving the communication from the non-bank PPI issuer. The burden of proving customer liability in case of unauthorized electronic payment transactions shall lie on the non-bank PPI issuer.

7) Complaints Escalation to RBI (CMS & IO)

Any person who has a grievance against our services can approach our Grievance Redressal Centre as per details provided at the, ("contacts us"), page of our website for addressing their concerns. Where the complaints are not resolved with full satisfaction of the complainant after the review by our grievance redressal working group or internal Ombudsman, the complainant is advised to approach RBI's complaint portal at <https://cms.rbi.org.in/cms/indexpage.html#eng> by giving the complete details on the complaint.

Section 3 – Process to handle Customer Grievances

There are two types of complaint resolutions.

- a) First, is FTR (First Time Resolution) and
- b) Second is Non-FTR (Non First Time Resolution).

In FTR, the complaint is routed by IVRS (Interactive Voice Response System), to an agent on duty, who responds to the complaint and tries to resolve the issue all by himself by giving the assistance in alternative, if the complaint is received by an e-mail, telephonic call, a letter or any other similar mode of communication to any company official, such complaint will be routed to officer-in-charge of CCC, who will get such complaint registered and responded to, by the agent of CCC.

Even after agent's intervention and assistance, if the complaint is not resolved, then the complaint is treated as Non- FTR and is treated as per its nature. The turnaround time for the Non-FTR complaint is as below -

Normal Cases: - In normal cases where the complaint can be resolved with the help of information available within the organization and can be used to resolve the issues, the turnaround time will be T+1 days.

Aggregator/Merchant's involvement – In cases where response from aggregator or merchant or both of them is required to be obtained, then the turnaround time will be 48 hours or as soon as the reply is received from such merchant or aggregator.

Exceptional Cases – In exceptional cases where the merchant is not able to find the information immediately related to a particular transaction due to very late bill payments such as bill payments made 10 days after the payment due date, then the turnaround time depends on the response time from the merchant. EbixCash must keep escalating the issue with the merchant on continuous basis. Under no circumstance should this process take more than 30 days from the date of receipt of the complaint.

The various channels through which our customers can contact us for any assistance or redressal of their grievances are listed below:

Grievances by the holder and/or user of EbixCash Prepaid Instrument:

Three Tier Grievance Redressal System

The Company has established customer grievances redressal machinery functioning at three levels:

- a) Customer Care Centre
- b) Customer Grievance Officer and
- c) Customers Grievance Redressal Working Group

Customer Care / Contact Centre

The Company has an established Customer Care Centre at its Corporate Office, which deals with all the operational issues and all the grievances referred to it. The Customer Care Centre is open on all days (24 by 7 by 365 days).

For quick reference, the contact details are provided herein below:

Customer Care Contact Details

| For | Toll free number | Email id | Website |
|------------------|------------------|--|---|
| Customer Queries | 1800 266 5757 | help@ebixcash.com | https://ebixcash.com/ |

The Customer Care Centre is responsible for the resolution of complaints & queries of all customers. The Officer-in- Charge of Customer Care Centre is responsible for ensuring resolution of all complaints received at Customer Care Centre to the customer's satisfaction.

Customer Grievance Officer

Complaints can be escalated to Customer Grievance Officer, if the customer is not satisfied with the response given by the Customer care center or is not satisfied with the resolution reached by the Customer Care Centre. Customer can send his complaint quoting the docket no of the grievance to the Customer Grievance Officer.

Customers Grievance Redressal Working Group

The customers who are not satisfied with the resolution of their queries by the Customer Care Centre and the Customer Grievance Officer can approach the Customers Grievance Redressal Working Group or the PNO (Principal Nodal Officer/Nodal Officers) for redressing their grievances. The details of the nodal officer can be found at the website of the company. The customer must quote the docket no of grievance that is being escalated to the Customer Grievance Redressal Working Group. The Working Group shall consist of two members.

The Officer-in-charge of the Customer Care Centre acts as the Secretary and co- coordinator for the said Working Group.

The functions of the Working Group are as under:

- a) The Working Group will address the grievance of the Customer if he/she is not satisfied with the decision of the Customer Care Centre and the Customer Grievance Officer.
- b) The Working Group shall have right to ask for all records from the Customer Care Centre, Customer Grievance Officer and the customer.
- c) The Working Group will look into the simplification of procedures and practices prevailing in the Company with a view to safeguarding the interests of customers of the Company.
- d) The Working Group will review the regulations and procedures prescribed by RBI for customer service and whether the same are adopted in spirit and intent by the Company and make suitable recommendations for rationalization of the same.
- e) The Working Group will review the practice and procedures prevalent in prepaid payment solutions industry and take necessary corrective action on an on- going basis.
- f) The Working Group will endeavor to proactively advice the Customer Care Centre on pending complaints.

Ombudsman mechanism for Settling of Disputes

- Settlement by Agreement./ Facilitation
- Settlement by Conciliation and Mediation
- Settlement by passing of award
- Award shall be a speaking order with directions for specific performance & compensation
- Appeal against award can be made by the complainant to the RBI ombudsman.
- No right to appeal if rejection is due to non-submission of information by the complainant.
- Complainant cannot file an appeal if rejection is due to, “no deficiency in service by the company,” or,” beyond the pecuniary powers of internal ombudsman.

Grievance Redressal Procedure

- a) A grievance may be communicated by the Complainant to the Working Group as per the convenience of the Complainant in physical or electronic mode, detailing the nature of complaint and quoting the docket id issued by the customer care team.
- b) Upon receipt of a grievance, the concerned officer shall secure the details thereof.
- c) All grievances received shall be acknowledged within three working days from the receipt of grievance by the Working Group.
- d) The Working Group shall resolve grievances escalated to the Working Group within 21 working days from the date of receipt of the grievance.

Final Redressal and Closure of Grievance by the Review Working Group

Grievance shall be treated as finally redressed and closed in any of the following circumstances:

- a) Where the Complainant has communicated his acceptance of the Company's decision on redressal of grievance communicated by Customer Care Centre or by any other means of communication or
- b) Where the Complainant has not communicated his acceptance of the Company's decision, within 3 (three) months from the date of communication of decision by the Customer Care Centre or the Working Group, as the case may be.

Implementation of the decision

The Management shall take all necessary steps to implement the decision of the Working Group.

Customer Grievance Mechanism

Customers Grievance Mechanism includes the step-by-step process and the contact details of the concerned officials. This document may be changed as and when there is a change in the person / process by the approval of the Director of the company.

Grievances by a person other than the holder and/or user of EbixCashPrepaid Instrument (System Participant):

Grievances between System Participants in respect of any matter connected with the operation of the payment system shall be resolved in accordance with the relevant provisions of the Payment and Settlement Systems Act, 2007, as may be amended from time to time.

Harmonization of Turnaround Time (TAT) and customer compensation for failed transactions using authorized Payment Systems

The Reserve Bank of India has finalized the framework on Harmonization of Turn around Time (TAT) for resolution of customer complaints related to failed transactions across all authorized payment system and compensation for such transactions. A large number of customer complaints emanate on account of unsuccessful or 'failed' transactions. Failure could be on account of various factors not directly attributable to the customer such as

- i. disruption of communication links,
- ii. non-availability of cash in ATMs,
- iii. time-out of sessions,
- iv. Non-credit to beneficiary's account due to various causes, etc.

Rectification / Compensation paid to the customer for these 'failed' transactions to be in uniformity.

It may be noted that:

1. The prescribed TAT is the outer limit for resolution of failed transactions; and
2. The banks and other operators / system participants shall endeavor towards quicker resolution of such failed transactions. Harmonization of Turnaround Time (TAT) and customer compensation for failed transactions using authorized Payment Systems.

Harmonization of Turn Around Time (TAT) and customer compensation for failed transactions using authorized Payment Systems

| Sr. no. | Description of the incident | Framework for auto-reversal and compensation | |
|---------|--|---|--|
| | | Timeline for auto-reversal | Compensation payable |
| I | I | III | IV |
| 1 | Automated Teller Machines (ATMs) including Micro-ATMs | | |
| a | Customer's account debited but cash not dispensed. | Pro-active reversal (R) of failed transaction within a maximum of T + 5 days. | ₹ 100/- per day of delay beyond T + 5 days, to the credit of the account holder. |
| 2 | Card Transaction | | |
| a | <u>Card to card transfer</u> Card account debited but the beneficiary card account not credited. | Transaction to be reversed (R) latest within T + 1 day, if credit is not effected to the beneficiary account. | ₹ 100/- per day of delay beyond T + 1 day. |
| b | <u>Point of Sale (PoS) (Card Present) including Cash at PoS</u> Account debited but confirmation not received at merchant location i.e., charge-slip not generated. | Auto-reversal within T + 5 days. | ₹ 100/- per day of delay beyond T + 5 days. |
| c | <u>Card Not Present (CNP) (e-commerce)</u> Account debited but confirmation not received at merchant's system. | | |
| 3 | Immediate Payment System (IMPS) | | |
| a | Account debited but the beneficiary account is not credited. | If unable to credit to beneficiary account, auto reversal (R) by the Beneficiary bank latest on T + 1 day. | ₹100/- per day if delay is beyond T + 1 day. |
| 4 | Unified Payments Interface (UPI) | | |

| | | | |
|---|--|---|---|
| a | Account debited but the beneficiary account is not credited (transfer of funds). | If unable to credit the beneficiary account, auto reversal (R) by the Beneficiary bank latest on T + 1 day. | ₹100/- per day if delay is beyond T + 1 day. |
| b | Account debited but transaction confirmation not received at merchant location (payment to merchant). | Auto-reversal within T + 5 days. | ₹100/- per day if delay is beyond T + 5 days. |
| 5 Aadhaar Enabled Payment System (including Aadhaar Pay) | | | |
| a | Account debited but transaction confirmation not received at Merchant location. | Acquirer to initiate “Credit Adjustment” within T + 5 days. | ₹100/- per day if delay is beyond T + 5 days. |
| b | Account debited but beneficiary Account not credited. | | |
| 6 Aadhaar Payment Bridge System (APBS) | | | |
| a | Delay in crediting beneficiary’s account. | Beneficiary bank to reverse the transaction Within T + 1 day. | ₹100/- per day if delay is beyond T + 1 day. |
| 7 National Automated Clearing House (NACH) | | | |
| a | Delay in crediting beneficiary’s account or reversal of amount. | Beneficiary bank to reverse the uncredited transaction within T + 1 day. | ₹100/- per day if delay is beyond T + 1 day. |
| b | Account debited despite revocation of debit mandate with the bank by the customer. | Customer’s bank will be responsible for such debit. Resolution to be completed within T + 1 day. | |
| 8 Prepaid Payment Instruments (PPIs) – Cards / Wallets | | | |
| a | <u>Off-Us transaction</u> The transaction will ride on UPI, card network, IMPS, etc., as the case may be. The TAT and compensation rule of respective system shall apply. | | |
| b | <u>On-Us transaction</u> Beneficiary’s PPI not credited. PPI debited but transaction confirmation not received at merchant location. | Reversal effected in Remitter’s account within T + 1 day. | ₹100/- per day if delay is beyond T + 1 day. |

Escalation Matrix

| Escalation Level | TAT | Name of Associates | Designation | Email id | Contact Number |
|------------------|-------------------|--------------------|---|--|----------------|
| 1st Level | Within 24 hours | Helpdesk | Helpdesk | help@ebixcash.com | 1800 266 5757 |
| 2nd Level | >24hrs < 72 hrs | Sadanprasad Gupta | Manager-Customer Care | sadang@ebixcash.com | 1800 266 5757 |
| 3rd Level | 3 Days to 10 Days | Kalpana Nimbalkar | Manager-Customer Care | kalpanan@ebixcash.com | 1800 266 5757 |
| 4thLevel | Up to 30 days | Rupak Mehendale | Sr. Manager-Customer care | rupakm@ebixcash.com | 1800 266 5757 |
| 5th Level | Beyond 30 days | Jimmy Bharucha | Chief Grievance Officer & Nodal Officer | jimmyb@ebixcash.com | 1800 266 5757 |
