LAKSHYA SKILL FINANCE

GRIEVANCE REDRESSAL & CUSTOMER COMPLAINT HANDLING POLICY

Policy Owner: Lakshya Skill Finance

FPOC – First Point of Contact: Ms. Pooja, Executive to CEO Office

SPOC – Senior/ Grievance Officer: Mr. Jaymin Mehta, Co-Founder

Effective Date: 10/07/2026 | Version: 1.0 | Review Frequency: Every Quarter

1. PURPOSE

Lakshya Skill Finance is committed to providing transparent, fair, accessible and responsive services to customers, applicants and other stakeholders. This Policy establishes a structured mechanism for receiving, recording, investigating, resolving, escalating and monitoring grievances relating to Lakshya's own services, employees, representatives, technology platform, customer interface and activities undertaken in its capacity as a Fintech/Lending Service Provider (LSP).

The objective is to ensure that every grievance is accessible, acknowledged, tracked, investigated objectively, resolved within defined timelines, and used to identify recurring or systemic issues.

2. SCOPE

This Policy applies to grievances raised by prospective applicants, customers/borrowers using Lakshya's platform or services, persons interacting with Lakshya employees or authorised representatives, and persons directly affected by Lakshya's customer-facing activities.

As Lakshya is a Fintech/LSP and not the Principal Lending Entity/Regulated Entity, matters exclusively attributable to the lending partner shall be routed/coordinated with the relevant lending partner in accordance with applicable arrangements and regulations.

3. GUIDING PRINCIPLES

Accessibility. Customers shall have convenient channels for raising complaints.

Transparency. Customers shall be informed of the complaint process, timelines and escalation mechanism.

Accountability. Every complaint shall have an identifiable owner.

Fairness. Complaints shall be investigated objectively and without discrimination.

Timeliness. Complaints shall be handled within prescribed internal TAT and applicable regulatory timelines.

Confidentiality. Complaint and customer information shall be handled on a need-to-know basis.

No Retaliation. No customer shall face adverse treatment for raising a genuine grievance.

Root-Cause Resolution. Lakshya shall identify and address recurring/systemic causes wherever appropriate.

4. GRIEVANCE REDRESSAL STRUCTURE

Level 1 – FPOC

Name: Ms. Pooja Rawat – Executive to CEO Office

Designation: First Point of Contact – Customer Grievances

Responsibilities:

- Receive and register complaints.
- Issue acknowledgement and complaint/reference number.
- Conduct preliminary review and coordinate with the concerned team.
- Obtain required information/documents.
- Monitor TAT.
- Communicate interim/final responses.
- Escalate matters to the SPOC where required.

Level 2 – SPOC

Name: Mr. Jaymin Mehta

Designation: Co-Founder – Senior/Principal Grievance Redressal Officer

Responsibilities:

- Review escalated/unresolved grievances.
- Review complaints involving material customer impact, alleged misconduct, fraud/security or systemic issues.
- Decide appropriate corrective action.
- Coordinate with lending partners where required.
- Oversee grievance MIS and management reporting.
- Review recurring complaints and corrective/preventive actions.

5. CHANNELS FOR LODGING GRIEVANCES

1. Dedicated grievance email.
2. Customer support email.
3. Mobile/digital application, where available.

4. Written complaint.
5. Telephone/customer support.
6. Physical correspondence.
7. Through an authorised representative.
8. Any other channel formally notified by Lakshya.

Relevant grievance contact details shall be prominently displayed on Lakshya's website/application and relevant customer-facing documentation.

6. COMPLAINT REGISTRATION

Every complaint received by Lakshya shall be recorded in the Complaint Register/Complaint Management System. Minimum records shall include:

- Complaint/reference number
- Date and time of receipt
- Customer name and contact details
- Application/loan reference, where applicable
- Nature/category and description
- Relevant documents
- Person/department responsible
- Acknowledgement date
- Expected resolution date
- Action taken and final resolution
- Closure date
- Escalation details, if any
- Root cause/corrective action, where applicable

7. ACKNOWLEDGEMENT

All identifiable complaints shall be acknowledged promptly. The acknowledgement should include the complaint/reference number, date of receipt, responsible grievance contact, broad understanding of the complaint, expected timeline and escalation mechanism.

8. GRIEVANCE CATEGORIES

The following categories are limited to matters that attract Lakshya in its capacity as a Fintech/LSP and relate to its own services, systems, personnel, representatives and customer interface.

A. Application & Customer Onboarding

- Application delay attributable to Lakshya
- Issues in submission of application/information through Lakshya's platform
- Difficulty in completing the digital application journey
- Incorrect/incomplete information captured by Lakshya
- Assistance relating to application documentation
- Customer communication regarding application status
- Deficiency in customer onboarding support

B. Digital Platform & Technology

- Website/application accessibility issues
- Login, OTP or authentication issues
- Technical errors during application submission
- Document upload/submission issues
- Digital application journey failures
- Technical issues affecting customer interaction with Lakshya
- Other technology/service interruptions attributable to Lakshya

C. Customer Communication & Service

- Non-receipt or delayed receipt of communication from Lakshya
- Incorrect or incomplete information communicated by Lakshya
- Delay in responding to customer queries
- Poor customer service or inadequate assistance
- Communication regarding application/documentation requirements
- Failure to provide information promised by Lakshya
- Other deficiency in customer-facing service

D. Employee / Representative Conduct

- Behaviour or conduct of Lakshya employees
- Conduct of authorised representatives, agents or channel partners
- Misrepresentation of Lakshya's services
- Mis-selling or misleading communication attributable to Lakshya/representatives
- Unprofessional behaviour

- Inappropriate customer interaction

E. Documentation & Information Support

- Delay in collection/submission of documents attributable to Lakshya
- Incorrect guidance regarding documents required
- Issues relating to documents submitted through Lakshya
- Failure to communicate documentation requirements appropriately
- Incorrect information provided by Lakshya regarding the application process

F. Data, Consent & Privacy

- Concerns regarding collection of customer information by Lakshya
- Consent-related concerns relating to Lakshya's platform/process
- Unauthorised use or disclosure attributable to Lakshya
- Data access/correction requests concerning information held by Lakshya
- Suspected data-security/privacy incidents involving Lakshya systems or personnel

G. Service Coordination with Lending Partners

- Complaint arising from Lakshya's role as LSP requiring coordination with a lending partner
- Delay or deficiency in coordination/communication by Lakshya
- Failure to appropriately route a partner-related customer complaint
- Failure to keep the customer reasonably informed of status, where applicable

H. Fraud / Impersonation / Misuse of Lakshya Identity

- Impersonation of Lakshya employees or representatives
- Fraudulent communication using Lakshya's name/brand
- Misuse of Lakshya's platform or digital interface
- Suspected unauthorised access to Lakshya systems
- Fraudulent activity directly involving Lakshya's platform, personnel or representatives

8.1 MATTERS OUTSIDE LAKSHYA'S DIRECT GRIEVANCE SCOPE

The following matters shall ordinarily be referred/coordinated with the concerned lending partner/Regulated Entity. Lakshya shall provide reasonable assistance in routing the complaint, but shall not assume responsibility for decisions exclusively within the Principal Lending Entity's authority:

- Final credit approval/rejection decisions
- Credit underwriting decisions
- Loan sanction terms determined by the lending partner

- Interest rate determined by the lending partner
- Loan agreement terms issued by the lending partner
- Final disbursement decision
- EMI/repayment terms determined under the loan agreement
- Repayment allocation maintained by the lending partner
- Foreclosure/prepayment decisions
- Collection/recovery activity undertaken independently by the lending partner or its appointed agency
- Credit bureau reporting undertaken by the lending partner
- Waiver/write-off decisions
- Loan restructuring
- Settlement of outstanding loan dues
- Other matters exclusively within the statutory, contractual or operational responsibility of the Principal Lending Entity

8.2 CUSTOMER HANDLING FOR OUT-OF-SCOPE MATTERS

9. Register the complaint.
10. Inform the customer that the matter falls within the relevant lending partner's responsibility, where applicable.
11. Forward/coordinate with the appropriate lending partner, wherever required.
12. Retain complaint/reference details for tracking.
13. Provide reasonable assistance in routing the complaint.
14. Inform the customer of the lending partner's designated grievance mechanism and further escalation process, where applicable.

9. TURNAROUND TIME (TAT)

Category	Target TAT
Simple/general complaint	3 working days
Service-related complaint	7 working days
Complex/third-party coordination	15 working days
Regulatory/legal/material complaint	As per applicable requirement
Final maximum internal resolution target	30 calendar days

Where resolution cannot be completed within the expected timeline, an interim response shall explain the status, reason for delay, information pending (if any) and revised expected resolution date. Statutory/ regulatory timelines shall prevail where applicable.

10. ESCALATION MATRIX

Level 1 – FPOC

Ms. Pooja Rawat – initial investigation, coordination and resolution.

Level 2 – SPOC

Mr. Jaymin Mehta, Co-Founder – escalation for unresolved complaints, disputed resolutions, material customer impact, alleged misconduct, fraud/security, data/privacy, repeated/systemic complaints or matters with regulatory/reputational implications.

Level 3 – Lending Partner / Applicable External Mechanism

Where the matter is outside Lakshya's direct scope, the complaint shall be coordinated with the relevant lending partner/regulated entity and the applicable external escalation mechanism shall be communicated where relevant.

11. COMPLAINTS INVOLVING LENDING PARTNERS

15. Lakshya shall register the complaint where received by Lakshya.
16. Lakshya shall coordinate with the concerned lending partner.
17. The customer shall be kept reasonably informed of status where applicable.
18. Regulatory responsibility shall remain with the relevant regulated entity to the extent prescribed by applicable requirements.

12. FRAUD AND SECURITY COMPLAINTS

Suspected fraud, impersonation, unauthorised access, identity misuse or misuse of Lakshya's platform/ brand shall be treated as priority complaints, escalated to the SPOC and, where appropriate, notified to the relevant lending partner, service provider or competent authority.

13. DATA PRIVACY AND CONFIDENTIALITY

Complaint information shall be confidential and accessible only to authorised personnel. Customer information shall be securely maintained and processed in accordance with applicable law and Lakshya's privacy framework.

14. COMMUNICATION OF FINAL DECISION

19. Complaint reference number
20. Summary of grievance
21. Investigation undertaken
22. Findings
23. Resolution/decision
24. Corrective action, if applicable
25. Refund/adjustment, if applicable
26. Explanation where grievance is not accepted
27. Date of closure
28. Applicable escalation option

15. CLOSURE OF COMPLAINTS

A complaint shall be closed only after appropriate investigation, final response, required corrective action and documentation. A complaint shall not be closed solely because the customer has not responded.

16. REOPENING OF COMPLAINT

A complaint may be reopened where new information is provided, the grievance was not adequately addressed, the resolution was not implemented, supporting documents are subsequently provided, or circumstances materially change. The SPOC shall determine whether reopening is warranted.

17. PROHIBITED PRACTICES

- Discouraging a customer from lodging a complaint
- Refusing to register a legitimate complaint
- Delaying registration
- Closing without adequate investigation
- Providing misleading information
- Threatening/intimidating a complainant
- Retaliation

- Manipulating complaint records
- Altering complaint dates to avoid TAT breaches
- Suppressing material complaints
- Unauthorised commitments
- Commercial retaliation through the grievance process

18. CUSTOMER GRIEVANCE MIS

- Opening complaints
- New complaints
- Resolved complaints
- Pending complaints and ageing
- TAT breaches
- Complaint category
- Product/source/channel
- Lending partner, where applicable
- Root cause
- Financial/customer impact
- Escalations
- Repeated complaints
- Fraud/security complaints
- Reopenings
- Corrective/preventive action

19. MANAGEMENT REVIEW

The SPOC shall periodically review grievance trends, repeat/systemic complaints, process gaps, employee/service-provider issues, technology failures, potential regulatory concerns, customer-impacting trends and TAT breaches. Material or systemic grievances shall be escalated to appropriate management.

20. ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION

For material, repeated or systemic complaints, Lakshya shall undertake RCA covering: Problem → Root Cause → Customer Impact → Corrective Action → Preventive Action → Owner → Target Date → Closure Evidence.

21. RECORD RETENTION

Complaint records, investigation documents, customer communications, resolutions and supporting evidence shall be maintained for the period prescribed under applicable law, regulatory requirements and Lakshya's record-retention policy.

22. CUSTOMER AWARENESS

The grievance mechanism shall be prominently communicated through appropriate customer-facing channels.

FPOC – Ms. Pooja Rawat
Email: strategy@lskfin.com
Contact No.: 7976234252

SPOC – Mr. Jaymin Mehta, Co-Founder
Email: Jayminmehta@lskfin.com
Contact No.: 9998950353

Working Hours: 10 to 06:30 – Monday to Friday

23. REGULATORY ALIGNMENT

This Policy shall be implemented in accordance with applicable laws, regulations, RBI directions applicable to the relevant regulated entity/LSP arrangement, digital lending requirements, consumer protection requirements, data protection requirements and contractual obligations with lending partners. Where a mandatory statutory/regulatory requirement conflicts with this Policy, the mandatory requirement shall prevail.

24. GOVERNANCE AND REVIEW

The Policy shall be reviewed at least annually and additionally upon material regulatory change, launch of a new product/channel, onboarding of a new lending partner, material grievance incident, significant operating-model change or management direction.

25. APPROVAL

For Lakshya Skill Finance

Prepared By:
Ms. Pooja
FPOC – Grievance Redressal

Reviewed & Approved By:
Mr. Jaymin Mehta
Co-Founder & SPOC – Grievance Redressal

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