



**OMBUDSPERSON POLICY-  
CUSTOMER/BUSINESS PARTNERS/ANY OTHER INDIVIDUAL  
OF  
HOME CREDIT INDIA FINANCE PRIVATE LIMITED**

**Version 1**

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## 1. Objective

The Company is committed to maintain the highest standard of conduct and professionalism keeping this core value in mind, has formulated a policy that shall encourage stakeholders to voice/escalate genuine concerns about unprofessional conduct/ or breach of the company Code of Conduct/ or any other unfair practice seen or observed while conducting business with Home Credit India or any of its representatives.

This policy should be read in conjunction with **Home Credit India Customer grievance re-dressal policy and Business partners' grievance re-dressal process.**

### **This policy aims to:**

- Provide an independent, informal, confidential and neutral forum by means of the Office of the Ombudsperson, for customers and business partners of the company to raise/escalate concerns and complaints about improper practices which are in breach of the Home Credit India Code of Conduct.
- Put in place a fair and equitable inquiry process and re-dressal mechanism
- The Ombudsperson Office seeks to promote a fair conflict management system and supports systemic changes to achieve this goal.

Reassure customers and business partners, that each one will be fully protected against possible reprisals, intimidation, and coercive action, termination of relationship or victimization when a serious and genuine concern/complaint of apparent unprofessional conduct has been made in good faith.

## 2. Scope of policy

This policy is applicable to all "Concerned persons" dealing with Home Credit India, as listed below:

- **Customers** include, all individuals who have loans with us (Active or Closed loans), who have applied for a loan and has been rejected/cancelled
- **Business partners** include- the Point of Sales (POS), vendors and service providers, who are already empanelled with us and are either Active or closed, are in the process of empanelment and/or whose empanelment is rejected/cancelled
- Any other individual whose information or documents has been misused to create a loan relationship with Home Credit India Or a prospective candidate whose application for employment has been rejected/cancelled by HCI
- Whistle blower

\*The "complainant" may either be an observer who is not directly impacted, or a victim who is directly impacted.

This Policy allows all the "Concerned persons" to escalate Concerns which includes complaints, issues or information of acts or conducts which lead to material loss, reputation loss or a sense of harassment.

This policy also lays down the procedures to be followed for handling such Concerns by the office of Ombudsperson.

## 3. Powers and responsibilities of Ombudsperson:

- Using an alternative dispute resolution (ADR), an organizational ombudsperson provides options for all "Concerned persons" who seek to bring their concerns forward safely and effectively

- Ombudsperson at HCI acts as appellate authority for “Concerned persons”, who wants the decision taken by management to be reviewed. Decision of the Ombudsperson office shall be binding to all the parties.
- Ombudsperson at HCI, offers coaching on ethics and other management issues, provides mediation to facilitate conflict resolution, helps enable safe upward feedback, assists those who feel harassed and discriminated.
- Ombudsperson at HCI will act when concern is raised against senior management.
- Ombudsperson at HCI aim to bring systemic concerns to the attention of the organization for resolution and process improvements.

### **3. Protection**

The Policy offers protection to the person who discloses/escalates the concern/complaint to the Ombudsperson as well as to the person referred as victim in such Complaint provided such disclosure/escalation is made in good faith.

A complainant concerned person is not a 'trouble maker' or 'sneak' but a person who has come to the decision to express a concern regarding possible unprofessional conduct, after a lot of thought. The onus of proving the allegation shall not lie upon the complainant however he/she may be during the course of any enquiry requested to produce any proof/evidence or any other related matter to support the claim made.

The policy only requires that there be a genuine concern - the person making the complaint is not expected to produce unquestionable evidence in support of the allegation.

The Company has an obligation to ensure that a complainant who makes a disclosure in good faith and without malice is protected from reprimand or action, regardless of whether or not the concern raised is ultimately found to be correct. No action shall be required to be taken against the complainant when an allegation made in good faith is not confirmed by subsequent investigation.

However, if an allegation is made or a concern is raised frivolously, maliciously or for personal reasons, the Company may decide to take appropriate police or legal action or any other against the complainant.

\*Protection is limited to maintaining the confidentiality of the complainant person and does not anywhere implicate the obligation of providing personal security or police protection.

#### **3.1 Confidentiality**

The Ombudsperson will treat all disclosures in a confidential and sensitive manner.

The identity of the person raising the concern will be kept confidential so long as it does not hinder or frustrate the investigation process. However, the investigation process may reveal the source of the information on a 'need-to-know-basis' and, under exceptional circumstances only to the parties privy to competent people/Ombudsperson office, the person making the disclosure may be required to furnish written statement during the course of an enquiry not amounting to any legal statement as part of the evidence.

### **3.2 Neutrality**

Ombudsperson will not serve as advocate for any party to a dispute, including management. However, Ombudsperson do advocate for fair processes and fair administration of those processes by organization. While making recommendations, Ombudsperson will have the responsibility to suggest actions or policies that will be as equitable as possible for all parties involved.

Home Credit India Ombudsperson, as designated neutrals, remain unaligned and impartial. The Ombudsperson will not engage in a situation which could create a conflict of interest.

### **3.3 Informality**

Home Credit India Ombudsperson shall ensure speedy disposal of the complaint. For this, the Ombudsperson shall have the authority to adopt any process/ method which may not be formal or recorded as per the Company Policy.

HCI Ombudsperson provide an informal resource to all the parties. They do not participate in any formal adjudicative or administrative procedure related to concerns brought to their attention.

HCI Ombudsperson do not conduct formal investigations, adjudicate, arbitrate, or serve as witnesses in any administrative or legal proceedings either at HCI or elsewhere. Ombudsperson's office shall have the authority to get the above mentioned activities managed through other functions of the company

Accordingly, management at HCI will be considered to have agreed to abide by these principles and not to seek to compel the Ombudsperson or their staff to testify with respect to confidential communications.

### **3.4 Independence**

HCI Ombudsperson office is independent in structure, function, and appearance. An Ombudsperson functions independently of line management.

The Ombudsperson reporting relationship is with the highest authority in an organization. HCI Ombudsperson reports to the Board of Directors.

The Ombudsperson will treat all disclosures in a confidential and sensitive manner.

## **4. Office of the ombudsperson**

The Ombudsperson will administer the policy, for which he/she will have an office with the necessary facilities, ensuring complete confidentiality.

Any exception to the policy will be required to be approved by the Board of Directors.

**Complaints to Ombudsman office can be received from "Concerned person" as defined in section 2.**

## 5. Grounds of Raising a Concern

1) **Concerns from the Customers pertaining to deficiency in any of the financial Services or breach of the terms and conditions of the loan and where standard process for resolution does not exist or customer is not happy with the resolution provided or in case of confidentiality, such as and not limited to:**

- Mis-selling
- Payments not updated
- Misuse of customer information
- Harassment – verbal/physical
- Collection calls to a Non customer
- False -commitment or any other concern related to him/her directly or indirectly
- Claim of wrongful rejection or cancellation

2) **Complaints and grievances from Business partners/Vendors, where standard process for resolution does not exist or he/she/it is not happy with the resolution provided or in case of confidentiality, such as and not limited to:**

1. Non-payment of dues
2. Harassment during investigations etc.
3. Reputation loss
4. Unfair treatment and false-commitment
5. Breach of terms and conditions of agreement
6. Fraud etc.

3) **Complaints and grievances can be raised/escalated by any other individual for possible misuse of their information, data or documents and from “Whistle blower”.**

### 5.1 Procedure for addressing a concern

#### 5.1.1 How to voice a concern

**Home Credit India has a well-defined and structured Customer and Business Partner grievance re-dressal policy and process. All concerns should follow the standard approach and Ombudsperson office will guide “Concerned persons” to the formal channels based on the concern type.**

A person wishing to raise a concern may do so with the Ombudsperson, either verbally or in writing by giving background and history of the unprofessional conduct, the reason and grounds for raising the concern, the identity of the individuals who may be involved and documentary evidence, wherever available. The earlier the concern is raised, the better.

Complaints may be sent in either of these forms:

- in writing (through hard copy mail) to:  
**The Ombudsperson**  
Home Credit India Finance Private Limited

Infinity Towers, Tower C, 3rd floor,  
DLF Phase-2, Gurgaon-122001, India.

- In writing (through email) to a secure email id- [ombudsperson@homecredit.co.in](mailto:ombudsperson@homecredit.co.in)
- By filling a complaint form online- "Contact us" page on our Home Credit India website ( To be introduced later)
- By calling on dedicated secured phone line between 9.30am to 5.30pm from Monday to Friday on ..... (To be introduced later)

### **5.1.2. Complaints/Concerns review process**

#### **Review and acceptance of complaints**

**Ombudsperson office will review all the complaints received by them and would reject complaints, if they belong to the following categories:**

- 1) If the complainant hasn't approached Home Credit earlier or the matter is already under consideration by the standard redressal channels. The complaint would be accepted only if Home Credit has
  - Not acted within the promised turnaround time or has been rejected or cancelled by the standard redressal process or
  - No reply received within one month post the concern was raised or
  - Complainant is not satisfied with the reply/resolution given
- 2) If the complaint has been made to Ombudsperson later than one year after the cause of action.
- 3) If the complaint is in regards to the same subject matter by the same complainant which was settled through Ombudsperson in any previous proceedings.
- 4) If the complaint for same subject matter is pending before any court, tribunal or arbitrator or a final order has already been passed by such an authority
- 5) If the complaint is frivolous, vexatious or malafide in nature or has been pursued without sufficient cause and reasonable diligence, as confirmed during review/investigation by Ombudsperson office.

### **5.1.3 The complaint re-dressal process**

The policy provides for an investigation and resolution process in 3 stages:

- **Stage 1:** When a matter is referred to the Ombudsperson, he/she will conduct a preliminary review to determine whether there is, at first face, a case for pursuing the matter further. First time complaints for which standard re-dressal process exists, will be sent to concerned authority/department for re-dressal.

For other valid concerns, the Ombudsperson will hear the concerned and review the documentary evidence, if any

- **Stage 2:** If the findings from stage 1 confirm the concerned person's allegations/concerns, the Ombudsperson will then initiate a **preliminary investigation**, in which both concerned and the other party will be heard. The evidences provided will be reviewed more thoroughly. The Ombudsperson may if need to be ask for supporting's from concerned departments/individuals. In most cases, the concern shall be resolved at this stage itself.
- **Stage 3:** Should this preliminary investigation confirm the issue raised and it is found to be of a nature requiring a **full investigation**, the Ombudsperson will hear any other parties or witnesses he/she wishes to call. During the process of investigation, Ombudsperson will seek support of relevant departments like Security, HR, Legal and Compliance, Internal Audit or Others to investigate further and gather evidences.

While investigating the complaint, the Ombudsperson will take into account the following factors:

- **the seriousness of the alleged improper conduct**
- **the credibility of the concern**
- **the likelihood of getting confirmation about the improper practice from attributable sources**

#### **Timelines:**

1. Understand the concern/complaint, review evidences and interact with person who raised the concern- within 2 working days of receiving the concern/complaint
2. Update on status and/or possible solution to the person who raised the concern- within 10 working days of receiving the complaint
3. Max TAT for complaint resolution, where all parties are available and responding- 30 days

#### **5.1.4. Key considerations:**

- The investigation and resolution will be handled with agility and confidentiality understanding the sensitivity of the issue.
- However, to ensure that fairness will not be compromised, hasty investigation procedures will be avoided, which may from time to time lead to some delayed resolution in cases involving multiple parties/evidences.

#### **5.1.5 Position of person against whom a concern is raised**

The person against whom the concern has been made will be given an opportunity to be heard by the Ombudsperson as soon as possible after receipt of the complaint and comment and state his/her position again before the investigation is finally concluded.

### **6. Resolution and actions taken**

Re solution of the complaint may be achieved at any of the 3 levels in the investigation process.

The 1<sup>st</sup> priority of the Ombudsperson office is to provide a fair, mutually beneficial resolution and close the complaint and recommend process changes to prevent such incidences in future.



In case the findings of the investigative process support the allegation/concern, action will be taken against the perpetrator(s) and alternate solution set to be provided, where required.

The Ombudsperson will prepare a detailed report of the final result, including recommended action to be taken if the complaint/disclosure is found to be genuine.

A summary report with recommended action in line with the Company's Disciplinary Policy, will be sent to the relevant HR management members.

The Ombudsperson will ensure that any action taken will be in proportion to the severity of the wrongdoing.

All enquires/investigations shall be supported by Incident Report and other related documents while closing the matter.

Furthermore, at the time of positive closure a written confirmation or on recorded phone line, shall be taken by concerned person confirming that he/she is satisfied with the resolution provided. In case of a negative outcome similar communiqué can be made to both the parties.

#### **7. Archival and Purging:**

Apart from above, Ombudsman office will maintain and track all concerns and their resolution, will store and archive all evidences and supporting's in a confidential manner and identify areas of improvement in the standard processes and recommend to the management team.

All the documents/ information pertaining to the matters raised before Ombudsperson shall be preserved in original at least for 12 months from the date of closure of matter by Ombudsperson and in soft/ scan copies for another 24 months after the completion of such 12 months.

#### **8. Reporting**

A quarterly report will be prepared by the Ombudsperson for review by the Board of Directors.

There will be a regular communication with the concerned Department heads and the Process Excellence team/Customer Experience team, on recommendation for process improvements where possible, to prevent more such issues in future.

#### **9. Communication and implementation of the Ombudsperson policy**

The implementation of this policy will be the responsibility of the Ombudsperson.

A copy of the policy is available for external stakeholders (Customers and Partners) on company website [www.homecredit.co.in](http://www.homecredit.co.in)