SHREM INVESTMENTS PRIVATE LIMITED

GRIEVANCE REDRESSAL POLICY

Approved By	Board of Directors
Effective Date	April 04, 2026
Version	1.0

GRIEVANCE REDRESSAL POLICY

A. PREAMBLE

Shrem Investments Private Limited is committed to maintaining a high standard of corporate behaviour and to provide such service and benefits to the Borrower/Investors/Employees/Stakeholders which are un-paralleled in the industry. Company understands that an effective Grievance mechanism is a mandatory requirement and has thus formulated a Grievance Redressal Policy (''Policy'') which inter alia also contains Grievance Redressal Mechanism.

This Policy aims to provide a framework for dealing with the Complaints of the Complainant(s) in a fair and transparent manner and educate the Complainant(s) about the processes to be followed to lodge a Complaint with the Company and/or the RBI, as applicable.

B. OBJECTIVE AND PURPOSE:

The objective of this Policy is to build and strengthen a culture of transparency and trust in the organization and to provide all stakeholders of Company with a framework / procedure for responsible and secure reporting of grievance to the Company's management.

The Policy has been designed to provide a robust mechanism for addressing and resolving the complaints and grievances raised by Complainant(s). It shall be ensured by the Company that:

i. the Complainant(s) are treated fairly and without bias, at all times;
ii. the Complaints raised by the Complainant(s) are dealt with courtesy and resolved promptly;
iii. the Complainant(s) are informed of the avenues to escalate their Complaints within the Company;
iv. the Complainant(s) 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;
v. Officials of the Company strive towards working in good faith and without prejudice towards the interests of the Complainant(s).

C. DEFINATION:

- **Board** shall mean the Board of Directors of the Shrem Investments Private Limited.
- **Director** means a director appointed to the Board of a company.
- **Board of Directors** shall mean in relation to a company, the collective body of the Directors of the company;
- **Borrower** shall mean a person who is interested in availing the loan.

- **Grievance Redressal Policy** Shall mean the Grievance Redressal Policy constituted by the Company.

- **Disciplinary Action** means any action that can be taken on the completion of / during the investigation proceedings in terms of this Policy including but not limiting to a warning, imposition of fine, suspension from official duties or any such action as may be deemed fit considering the gravity of the matter;

- **Grievance Redressal Officer (GRO)/ Principal Nodal Officer (PNO)** means an official appointed by the Board of Directors, who is responsible for ensuring timely resolution of all complaints made by Complainant(s) in line with the Grievance Redressal Mechanism of the Company and is also responsible for representing the Company and furnishing information on behalf of the Company in respect of complaints filed against the Company;

- **Complainant(s)** mean(s) the person who has made a Complaint including but not limited to the Borrowers/Investors/Employees/ Stakeholders.

- **Internal Ombudsman** (IO) means person appointed by Board of Directors where the Company is covered by and required to comply with the applicable RBI Internal Ombudsman Directions.

- **Reserve Bank of India (Internal Ombudsman for Regulated Entities) Directions, 2023** is a Scheme for resolving grievances in relation to services provided by entities regulated by Reserve Bank of India as applicable to the Company.

- **Senior Management** shall mean personnel of the company who are members of its core management team excluding Board of Directors. Normally, this would comprise all members of management one level below the executive directors, including all functional heads.

D. MECHANISM FOR COMPLAINTS

Complainant(s) can lodge his / her grievance through any of the following channels:

A. Complaints through physical mode/ post / email:

i. The Company will always make effort to redress the complaints of the Complainant(s) at the earliest and in the best possible way.

Level- 1

ii. Mr. Hitesh Chhatwal, the Grievance Redressal Officer/ Principal Nodal Officer who can be approached by the Complainant(s) for resolution of complaints against the Company at the following address: -

Mr. Hitesh Chhatwal
Grievance Redressal Officer
Address- 1101, Viraj Towers, Jn Of Andheri Kurla Road W. E. Highway, Andheri (East), Mumbai 400093
Mail ID- shremgroup@shrem.in
Contact details-9619888312

iii. If the complaint / dispute is not redressed or remains unresolved within a period of 7 days by the Grievance Redressal Officer, the Complainant(s) may mail to Internal Ombudsman (IO) of the company at **smalani@shrem.in**

Level- 2

If the complainant does not receive any reply within 30 days from the date of the complaint lodged or receives non satisfactory reply, then she/he can register her/his complaint with the RBI Ombudsman.

Complainant can write/Mail/Call to RBI Ombudsman for registering his/her complaint (under a centralized Complaint Management System). The complaint may be directly registered by the complainant in the complaint management portal (https://cms.rbi.org.in) developed by RBI.

The complaint shall be submitted in electronic or physical mode in such format and containing such information as may be specified by RBI on below address:

Centralised Receipt and Processing Centre,
Reserve Bank of India,
4th Floor, Sector 17,
Chandigarh — 160017

E. INTERNAL OMBUDSMAN

In terms of Master Direction - Reserve Bank of India (Internal Ombudsman for Regulated Entities) Directions, 2023 ("IO Master Direction"), Company shall appoint Internal Ombudsman (IO) fulfilling criteria detailed thereunder.

1. The Internal Ombudsman (IO) will address all Complainant(s) grievances that have been partly or wholly rejected by the Company, except those explicitly outside the purview of the IO.

2. The decision of the IO shall be binding, except when the decision is rejected by the senior management of the Company.

The role and responsibilities of the Internal Ombudsman (IO) are as follows:

- The IO shall only handle complaints that have already been examined by the Company but have been partly or wholly rejected.
- Complaints that are outside the IO's purview, as defined by the IO Master Directions, shall be referred back to the Company.
- The IO shall analyze the pattern of complaints and suggest measures to address the root causes of repeated or similar complaints, including those requiring policy-level changes within the Company.
- The IO will examine complaints based on the records available with the Company, including any documents submitted by the complainant and any comments or clarifications provided by the Company to the IO.
- The IO may request additional information from the complainant through the Company and is required to record a reasoned decision in each case.
- The IO shall also perform any other roles and responsibilities as required by the Board or as per extant rules, guidelines, and any applicable policies.

F. COMPLIANCE WITH RBI REGULATIONS

As an NBFC, company shall fully comply with the RBI's regulations related to grievance redressal. The company ensures that:

- Grievance redressal procedures are transparent and easily accessible.
- All grievances are addressed within 30 working days, as per the RBI's guidelines.
- Grievance Redressal Officer and/or Internal Ombudsman is appointed to address and resolve grievances promptly.
- Regular reports on grievance redressal are submitted to the RBI.

G. CONFIDENTIALITY AND PRIVACY

All information provided during the grievance process will be treated with the highest level of confidentiality. Company will not disclose any personal or sensitive information without your consent, except where required by law.

H. PRESERVATION OF RECORDS

The records pertaining to complaint shall be preserved for a period of three years from the date of final intimation of closure to the Complainant.

I. REVIEW

This Policy is subject to review by the Board as and when deemed necessary. The Board shall conduct an annual review of the functioning of the company at various levels of management.

J. MONITORING AND REPORTING

- The Company will periodically review the grievance redressal process and make improvements where necessary.

- The Company will also submit reports on grievance handling to the Board of Directors and RBI (as required), detailing the number of grievances, types, resolution times, and any trends observed if any.
- The Internal Ombudsman will submit quarterly reports on grievance patterns and any suggestions for process improvements or policy changes if any.

K. CONTINUOUS IMPROVEMENT:

- The Company will use the data gathered from grievance handling to identify areas for continuous improvement in services, policies, and processes.
- A formal review mechanism will be implemented to assess the root causes of grievances and prevent recurring issues.

L. REVIEW AND AMENDMENT

The Board will review this Policy at least annually. The Board reserves the right to amend or modify this Policy as and when required.

Adopted by the board of directors of Shrem Investments Private Limited on April 04, 2026.

For Shrem Investments Private Limited

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Nitan Chhatwal
Director
DIN: 00115575