LRSD SECURITIES PRIVATE LIMITED

GRIEVANCE REDRESSAL MECHANISM

Document Title	Grievance Redressal Mechanism
Entity Classification	Non-Banking Financial Company - Middle Layer
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Approved by	Board of Directors
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PRELIMINARY

1. Policy Statement

1.1. **LRSD Securities Private Limited** (hereinafter referred to as **"LRSD"** or the "**Company**") is committed to providing the highest standards of customer service and ensuring that all grievances and complaints are addressed in a fair, transparent, and timely manner.

1.2. The Grievance Redressal Mechanism has been established to ensure that customers, stakeholders, and employees have a clear and effective channel to voice their concerns, complaints, or feedback and that these are resolved promptly and satisfactorily.

1.3. This policy is formulated in compliance with the ***Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025, dated 28 November 2025 and The Reserve Bank- Integrated Ombudsman Scheme, 2021***. The Directions mandate NBFCs to formulate and adopt sound grievance redressal mechanism for the Company.

1.4. The Company shall frame this grievance redressal mechanism with the approval of the Board of Directors, considering the guidelines and directions issued by the RBI, and shall be published on the Company's website for the information of various stakeholders.

2. Purpose of the Policy

2.1. The Grievance Redressal Mechanism of the Company ensures that:

2.1.1. All grievances are logged, acknowledged, and addressed promptly.

2.1.2. Appropriate measures are taken to prevent the recurrence of issues and enhance overall service quality.

2.1.3. Ensure that the Company's management acts in the best interest of all stakeholders, adhering to ethical practices and regulatory compliance.

2.2. The Company's policy on Grievance Redressal has been formulated considering the following objectives: -

2.2.1. To establish a structured redressal mechanism for the customers and other stakeholders to resolve their grievances immediately;

2.2.2. To institute a mechanism within the Company's operations for receiving and addressing customer complaints, with a focus on resolving such complaints expeditiously and in a fair manner.

2.2.3. To uphold the Company's commitment to ethical practices, responsible business conduct, and customer protection, thereby strengthening its standing as a trusted and reputable Non-Banking Financial Company

3. Applicability of the Policy

3.1. The Policy covers the grievance of the customer of Company who may approach the offices of Company for the resolution of their complaints, without any scope for discrimination.

3.2. A customer grievance regarding deficiency in service shall refer to any shortcoming or inadequacy in the delivery of financial services, or any related services that Company is obligated to provide, or any outsourced services, whether mandated by statutory requirements or otherwise. Such deficiencies may or may not result in financial loss or damage to the customer.

3.3. In the event the Company engages any third-party service provider or outsources any of its services, the Company shall ensure that appropriate mechanisms are in place to address customer grievances arising out of or in connection with such outsourced services. Any grievance relating to any act, omission, deficiency, misconduct, delay, or service failure attributable to such service provider, insofar as it impacts the customers of the Company, shall be appropriately addressed and resolved by the Company in accordance with its internal grievance redressal framework. The Company shall remain responsible for providing suitable grievance redressal support to its customers for grievances arising from outsourced activities or services.

3.4. The redressal mechanism ensures that all the disputes arising out of the decisions of Company's operational management or otherwise are heard and disposed of at least at the next higher level.

PROCESS AND REQUIREMENTS

4. Grievance Redressal Officer & Principal Nodal Officer

4.1. The Grievance Redressal Officer (GRO) shall be responsible for:

- 4.1.1. Reviewing and addressing customer complaints escalated beyond the initial resolution stage.
- 4.1.2. Ensuring fair and timely resolution of grievances in accordance with regulatory guidelines.
- 4.1.3. Acknowledging receipt of complaints and providing final resolution within 30 days from the date of receipt of the complaint, inclusive of all internal escalation stages including review by the Grievance Redressal Officer and the Principal Nodal Officer.
- 4.1.4. Communicating interim updates, if any, along with the expected resolution timeline, ensuring that the final resolution is provided within 30 days from the date of receipt of the complaint.
- 4.1.5. Maintaining records of complaints and resolutions for audit and compliance purposes.

4.2. The Principal Nodal Officer, being a senior-level official, shall be responsible for:

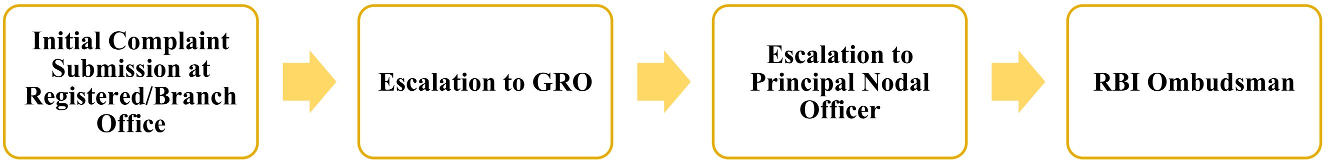
- 4.2.1. Overseeing the overall grievance redressal mechanism of the Company.
- 4.2.2. Handling complaints that remain unresolved at the GRO level ensuring that escalation to the Principal Nodal Officer and resolution are completed within the overall 30 days' timeline prescribed by RBI.
- 4.2.3. Providing final resolutions and ensuring proper documentation of grievances and actions taken.
- 4.2.4. Representing the Company in respect of complaints filed against the Company under the Reserve Bank- Integrated Ombudsman Scheme, 2021 or any other regulatory mechanism as may be applicable from time to time.

4.3. Both officers ensure adherence to the principles of natural justice, timely redressal of customer grievances and non-discrimination while maintaining transparency and accountability in the grievance redressal procedure.

4.4. Furthermore, the Company's machinery addresses issues, if any, related to the services provided by the outsourced agency.

5. Grievance Redressal Mechanism

The Company is committed to providing the highest level of customer service and ensuring that grievances and complaints are addressed in a fair and timely manner. Customers having any grievances, complaints, or feedback regarding the products or services offered by the Company may raise their concerns as per the procedure outlined below:



5.1. Step 1: Initial Complaint Submission

Customers can lodge their complaints through the following channels:

5.1.1. **Corporate Office** – Customers may visit the office and submit a written complaint, fill out the grievance form, and obtain an acknowledgment receipt with a reference number for tracking the complaint during the working hours from 10 A.M to 6 P.M. (Monday to Friday)

5.1.2. **Email** - Customers can send their grievances via email to: admin@lrsdindia.com.

5.1.3. Postal Communication – Complaints can be sent in writing to:

Company Name: LRSD Securities Private Limited

Corporate Office Address: Unit No. Silver 27/01 and 27/02 Wave One, Block L, Sector 18, Noida, Gautam Buddha Nagar, Uttar Pradesh, India, 201301

5.2.Step 2: Escalation to Grievance Redressal Officer (GRO)

If the customer is dissatisfied with the response provided at Step 1 or does not receive a response within seven (7) days, the complaint may be escalated to the Grievance Redressal Officer (GRO).

5.2.1. **Name of the GRO:** Mr. Rama Chandran Nair

5.2.2. **Designation:** Grievance Redressal Officer

5.2.3. **Contact No.:** +91 98118 45727

5.2.4. **Email ID:** admin@lrsdindia.com

Address: Unit No. Silver 27/01 and 27/02 Wave One, Block L, Sector 18, Noida, Gautam Buddha Nagar, Uttar Pradesh, India, 201301

5.2.5. Customers may also visit the officer in person at the above address.

5.2.6. Anonymous complaints shall not be addressed. While lodging a complaint, customers must mention the complaint number (if already generated) along with their Loan Application Number or Loan Account Number and relevant details of the grievance.

5.2.7. If, in any case, the Company requires additional time for resolution, the customer shall be informed of the reason for the delay within the prescribed timeline, along with the expected timeframe for complaint resolution.

5.3.Step 3: Escalation to Principal Nodal Officer

If the complainant is not satisfied with the resolution provided by the Grievance Redressal Officer, or if the grievance remains unresolved for 07 days under Step 2, the complainant may escalate the complaint to the Principal Nodal Officer. The Principal Nodal Officer shall review the complaint and ensure that a final resolution is communicated to the complainant within 30 days, in accordance with RBI guidelines.

5.3.1. **Name of the Principal Nodal Officer:** Mr. Lalit Dua

5.3.2. **Designation:** Principal Nodal Officer

5.3.3. **Contact No.:** +91 98102 12045

5.3.4. **Email ID:** pno@lrsdindia.com

Address: Unit No. Silver 27/01 and 27/02 Wave One, Block L, Sector 18, Noida, Gautam Buddha Nagar, Uttar Pradesh, India, 201301

5.3.5. The Company may furnish email ID for complaint escalation and shall ensure that the final response is communicated to the customer within 30 days from the date of receipt of the complaint in accordance with RBI guidelines.

5.4. Step 4: RBI Ombudsman Scheme

5.4.1. The customer has the option to escalate the complaint under the *Reserve Bank – Integrated Ombudsman Scheme, 2021*, provided the customer has not approached any other forum in following conditions:

5.4.1.1. If the Complaint is rejected wholly or partly by the Company; or

5.4.1.2. The customer remains dissatisfied with the response; or

5.4.1.3. No reply is received from the Company within 30 days after the Company has received the complaint;

5.4.1.4. The complaint is made to the Ombudsman within one year after the complainant has received the reply from the Company, or, where no reply is received, within one year and 30 days from the date of lodging the complaint.

5.4.2. The Complaint can be filed through the following channels:

ONLINE	• CMS PORTAL (24*7) • https://cms.rbi.org.in
EMAIL	• Email Submission • crpc@rbi.org.in
PHYSICAL/ ELECTRONIC SUBMISSION	• Written Complaint (Prescribed Format- Annexure A of RBI Scheme) • Centralised Receipt and Processing Centre (CRPC) 4th Floor, Reserve Bank of India, Sector -17, Central Vista, Chandigarh – 160017

5.4.3. The complainant aggrieved by an Award or rejection of a complaint by Ombudsman office may within 30 days from date of receipt of communication of award or rejection of complaint, prefer an appeal to Executive Director, Consumer Education & Protection Department (CEPD), RBI.

5.4.4. If the Appellate Authority is satisfied that the complainant had sufficient cause for not making an appeal within the time may allow a further period not exceeding 30 days.

5.4.5. The Complaint shall be made to the RBI Ombudsman not later than one year after receiving a reply from the Company or one year and thirty days if no reply is received from the Company.

***Note:** *If the Complainant approaches the RBI Ombudsman without first lodging a complaint with the Company or doing so before 30 days after lodging the complaint (wherein no response is received from the Company) would make the complaint non-maintainable under RBI-IOS 2021.*

Furthermore, this is an Alternate Dispute Resolution Mechanism. The Complainant has the liberty to approach the Court, Tribunal, Arbitrator or any other forum or authority.

6. Closure of Complaints

6.1. The complaint shall be considered as disposed-off and closed when:

6.1.1. The Company has acceded to the request of the complainant fully; or

6.1.2. Complainant has indicated acceptance of the response of the Company in writing; or

6.1.3. Complainant has withdrawn the complaint, in writing.

7. Grievance Logging and Monitoring

The Company follows a structured process to ensure that every grievance is properly documented, tracked, and resolved within prescribed timelines.

7.1. **Complaint Registration**

7.1.1. All complaints received through the Company's helpline, email, or branch office shall be formally recorded in the internal grievance register.

7.1.2. Each complaint will be assigned a **unique reference number**, which will be communicated to the customer for future correspondence.

7.2. **Complaint Details**

The grievance register shall capture the following information:

7.2.1. Name and contact details of the complainant

7.2.2. Date and mode of receipt (phone, email, branch visit)

7.2.3. Nature of grievance

7.2.4. Supporting documents, if any

7.3. Customer Tracking

7.3.1. Customers may ascertain the status of their complaint at any time by writing to the Grievance Redressal Officer, quoting the reference number allotted at the time of registration of the complaint.

7.4. Escalation Process

7.4.1. If a complaint remains unresolved within the prescribed timelines, it shall be escalated in accordance with the escalation matrix:

Grievance Redressal Officer → Principal Nodal Officer → RBI Ombudsman

7.4.2. All escalations must occur within the overall **30 days resolution timeline** mandated by RBI's Integrated Ombudsman Scheme, 2021.

8. Consumer Protection Committee

8.1. The Company has constituted a Consumer Protection Committee (CPC) comprising members of senior management, with the objective of ensuring an effective and compliant grievance redressal framework across the organization. The functioning and composition of the Committee shall be periodically reviewed and approved by the Board of Directors.

8.2. The CPC shall serve as an internal monitoring and advisory body and shall not directly participate in the operational steps of complaint resolution, but shall ensure that such processes remain robust, fair, timely, and compliant with all applicable guidelines.

8.3. The Company shall quarterly analyse complaint trends and undertake root cause analysis to identify systemic issues and implement corrective and preventive actions.

9. Reporting & Compliance Requirements

In adherence to the regulatory framework and in line with the Reserve Bank of India, the Company shall ensure the following reporting and disclosure requirements are fulfilled in a timely and comprehensive manner:

9.1. Website Disclosures: The Company shall ensure that the following are clearly and prominently published on its official website:

- 9.1.1. Contact details of the Grievance Redressal Officer (GRO) and email ID.
- 9.1.2. The grievance redressal mechanism of the Company including the step-wise process for lodging and escalating complaints.
- 9.1.3. The time frame fixed for responding to complaints at each level.

9.2. Display at Business Location: The name and contact details (telephone/mobile number and email ID) of the GRO and Principal Nodal Officer, along with the details of the RBI Ombudsman complaint lodging portal (https://cms.rbi.org.in), shall be displayed prominently at all places of business for the easy access and benefit of customers.

9.3. Display of the Ombudsman Schemes:

- 9.3.1. The salient features of the *Reserve Bank – Integrated Ombudsman Scheme, 2021,* shall be displayed prominently in English, Hindi, and the regional language at all branches, offices, and business locations of the Company.
- 9.3.2. The display shall be made in such a manner that any person visiting the branch or office has adequate and accessible information about the Scheme and the available avenues for grievance redressal.

9.4. The Company shall comply with all reporting and disclosure obligations as prescribed under *Reserve Bank of India (Non-Banking Financial Companies – Responsible Business Conduct) Directions, 2025* and other applicable RBI directions, schemes, and guidelines. These include, but are not limited to:

9.4.1. Number of complaints received.

9.4.2. Nature and status of complaints (resolved, pending, escalated).

9.4.3. Action taken and time taken to resolve complaints.

9.4.4. Status of escalations to the Ombudsman.

9.5. A consolidated report on all new and pending customer complaints, including an ageing analysis and any grievance received from Reserve Bank of India shall be reviewed by the Consumer Protection Committee and presented before the Board of Directors on quarterly basis or as and when necessary to ensure oversight and accountability in grievance handling.

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