

Grievance Redressal Policy



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Approved by	Board of Directors
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A. INTRODUCTION

- A.1 Les Amis Private Limited ("EximPe") is engaged in the business of providing Cross Border Payments services to Exporters and Importers of India
- A.2 The Reserve Bank of India ("RBI") vide notification dated October 31, 2023 "Regulation of Payment Aggregator – Cross Border" ("PA-CB Guidelines") issued vide CO.DPSS.POLC.No.S-786/02-14-008/2023-24 read with the "Guidelines on Regulation of Payment Aggregators and Payment Gateways, 2020" issued vide DPSS.CO.PD.No.1810/02.14.008/2019-20, 17 March 2020, (the "PA Guidelines") has laid out regulations for all Payment Aggregators – Cross Border ("PACB") to ensure that a suitable mechanism is in place for receiving and addressing complaints from its Merchants/Customers with specific emphasis on resolving such complaints fairly and expeditiously regardless of source of the complaints.
- A.3 This Grievance Redressal Policy has been formulated to provide Merchants and Customers adequate facilities to lodge and escalate their grievances, concerns and queries with EximPe and to provide a speedy and effective redressal mechanism for the same.

B. DEFINITION:

In this Grievance Redressal Policy, the following words and expressions shall have the following meanings, unless the context otherwise requires:

- B.1 Customers: This term refers to Indian Exporters and Importers who use EximPe's Cross-Border (CB) services. They are the primary users of EximPe's services in India.
- B.2 Counterparties: This designation is used for International Exporters and Importers who interact with EximPe Customers. Although not direct users of EximPe's Cross Border services, their interactions with EximPe Customers are integral to the service process.
- B.3 Grievance: A grievance is defined as any discrepancy between the service levels promised by EximPe and what is actually delivered. This encompasses both technical issues and communication errors, ensuring a comprehensive coverage of potential customer concerns.

C. PRINCIPLES AND OBJECTIVES OF GRIEVANCE REDRESSAL

- C.1 Human-Centric Innovation: EximPe is committed to innovating with a focus on the needs and experiences of our customers. This dedication guides our development of secure and efficient solutions.



- C.2 Prompt and Courteous Handling: We ensure all grievances are addressed quickly, aiming for initial response times within 24 hours, and handled with the utmost respect and courtesy.
- C.3 Efficient Resolution of Issues: EximPe pledges to resolve issues effectively and within clearly defined timelines, ensuring customer satisfaction.
- C.4 Fair and Equal Treatment: EximPe practices fairness and impartiality in handling all customer issues, ensuring an unbiased approach in every interaction.
- C.5 Clear Communication of Redressal Channels: Customers are informed about the various channels available for submitting and escalating complaints through our website and customer communications.
- C.6 No Charges for Filing Complaints: Lodging a complaint is free, emphasizing our commitment to accessible service.
- C.7 Continuous Improvement in Grievance Handling: We consistently seek to innovate and enhance our grievance redressal mechanisms for quicker and more effective resolutions.
- C.8 Employee Commitment: Our team is trained to act in good faith, prioritizing customer interests, and upholding the highest standards of service integrity.

D. Applicability

The Grievance Redressal Policy outlines a structured grievance redressal mechanism for the resolution of the grievances of the Customers of EximPe and informs the Customers of this mechanism of grievance redressal. This policy outlines the grievance redressal procedures for disputes that may arise during the course of the business conducted by EximPe . The 3 (Three) levels of grievance redressal are:

- The Customer Service Team;
- The Operations Head; and
- The Nodal Officer of EximPe.

The policy is relevant to all EximPe Customers and covers all products and services offered by EximPe in the realm of cross-border payment aggregation. This ensures a uniform approach to grievance handling across various EximPe company levels and customer interactions, maintaining consistency and efficiency in our service standards.

E. TEAM SENSITIZATION ON HANDLING COMPLAINTS

EximPe is committed to exceptional grievance handling through comprehensive team training. Our training modules focus on empathy, effective communication, problem-solving, and in-depth



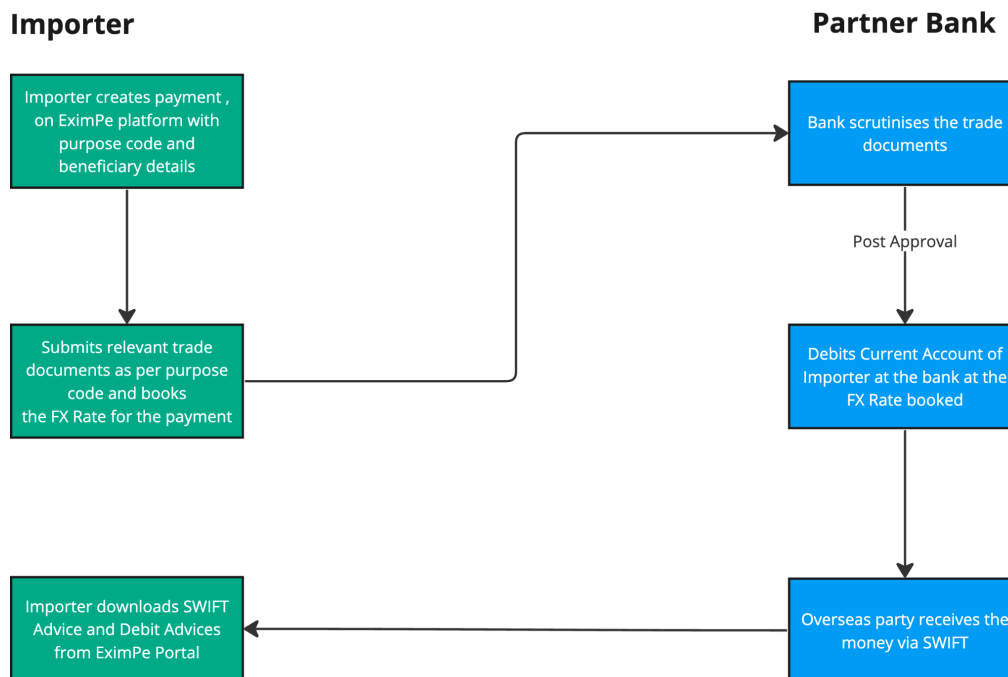
understanding of company policies. We conduct these sessions regularly to keep our team updated with the latest in customer service excellence.

We also integrate customer feedback into our training programs, enabling continuous improvement. The performance of our team in addressing grievances is closely monitored, and insights gained are used to refine training strategies.

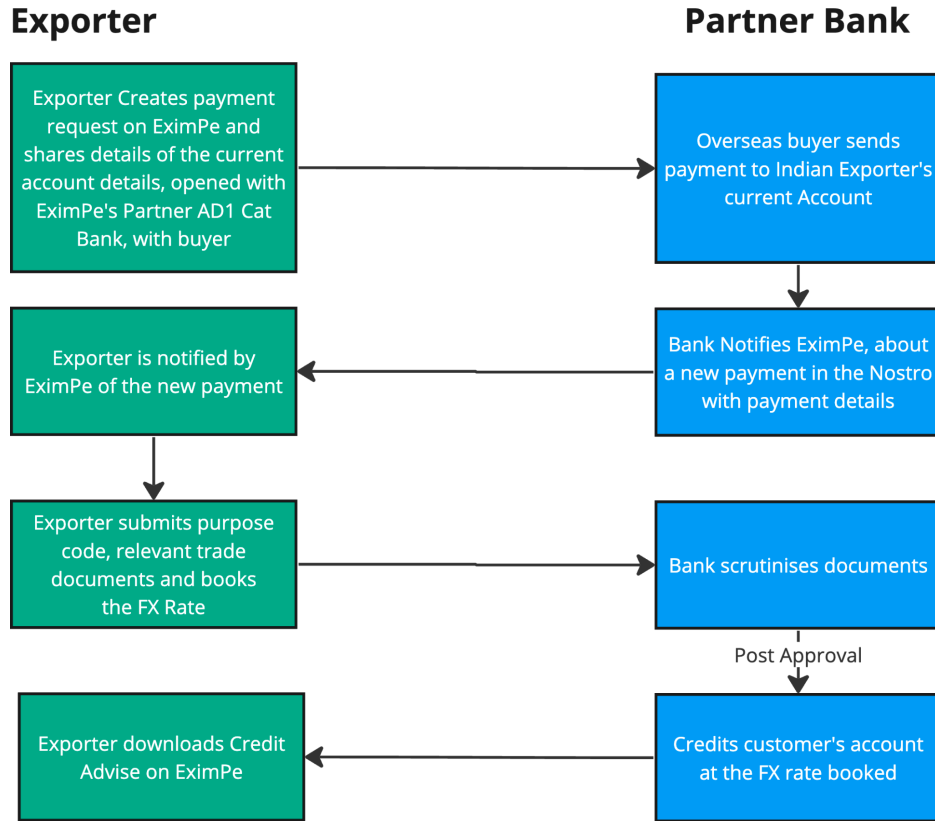
This training regimen is aimed at achieving first-time resolution of customer issues, thereby building trust and enhancing overall customer satisfaction. The impact of this training is evident in both our operational efficiency and the quality of our customer interactions.

F. TRANSACTION LIFECYCLE

Import Transaction Lifecycle



Export Transaction Lifecycle



G. GOVERNANCE FRAMEWORK

G.1 Grievance Redressal Committee:

The Grievance Redressal Committee at EximPe plays a pivotal role in maintaining high standards of customer service. Comprised of members from key areas of EximPe, the committee convenes monthly to meticulously review customer complaints and suggestions.

Their tasks include:

- Analyzing Complaints:** Studying the nature, number, and patterns of complaints to identify systemic issues and trends.
- Improving Service Quality:** Developing strategies and action plans based on these insights to enhance overall customer service.
- Ensuring Accountability:** Reviewing staff responses to complaints to ensure effective resolution and accountability.

- (d) Management Reporting: Regularly reporting findings and recommendations to senior management for further action.
- (e) Incorporating Feedback: Integrating customer feedback into their analyses to continually refine customer service practices.

G.2 Nodal Officer:

At EximPe, the role of the Nodal Officer is assigned to the Key Account Manager. This position entails:

- (a) Leadership in Complaint Handling: Ensuring the implementation of customer service and complaint handling guidelines as directed by senior committees.
- (b) Representative Role: Acting as the primary point of contact for the Ombudsman and other external entities in matters related to customer complaints.
- (c) Accessibility to Customers: The Key Account Manager’s contact information will be clearly displayed on the website, providing customers with a direct line for grievance escalation.
- (d) Reporting and Coordination: Regularly updating senior management about grievance handling status and any significant customer issues.
- (e) Collaboration with Customer Service: Working closely with the Customer Service Team to ensure efficient and effective resolution of customer grievances.

H. REASON CODES FOR DISPUTES

Error Code	Description	Category
400295	The transaction has been canceled	Transactions
400302	Transaction documents have been rejected	Transactions
400303	The booked rate has expired.	Transactions
400304	Insufficient balance to complete the transaction	Transactions
400305	The transaction was rejected by the customer/approval	Transactions

	failed	
400306	Transaction rejected due to Incorrect beneficiary details provided.	Transactions
400307	Suspicious Transaction	Transaction Monitoring
400308	Duplicate /Multiple Transaction	Chargeback
400309	Transaction volume limit reached	Transaction Monitoring
400310	Transaction waiting for approval	Transaction
400311	Transaction rejected due to unusual behavior	Transaction Monitoring
400312	Transaction flagged for further review	Transaction Monitoring
400350	Transaction rejected due to regulatory compliance	Transaction Monitoring
400408	Chargeback resolution in progress	Chargeback

I. REGISTRATION AND TRACKING OF COMPLAINTS

EximPe enables its Customers to register a complain using any of the following mechanism:

Channel Name	Contact Details
Email	support@eximpe.com
Support Desk	https://eximpe.freshdesk.com/support/tickets/new
Customer Care/Help Line Number	+91 77188 79954
Whatsapp	Whatsapp chat is integrated in the application and in the official website or can be directly contacted at +917968218219

- I.1 Based on the nature of the ticket, the complaints shall be classified into High, Medium and Low Priority tickets.
- I.2 Customers will be required to necessarily provide the following details while communicating with EximPe:
 - (a) Customer name
 - (b) Registered mobile number and email address
 - (c) Transaction ID (if applicable)
 - (d) Transaction Date and Time (if applicable)
 - (e) Trade Contract (if applicable)
 - (f) Product Type - Trade Finance, Trade Payments
 - (g) Detailed description of the issue along with evidences (screenshots, video etc)
- I.3 Counterparties can also contact EximPe to report any grievances, EximPe will consider their requests and assist in the resolution, but is not legally obliged to do so. The counterparties needs to provide the following information
 - (a) Counterparty name and contact details
 - (b) Name of the EximPe Customer
 - (c) Bank Transaction ID (if applicable)
 - (d) Trade Contract (if applicable)
 - (e) Transaction Date (if applicable)
 - (f) Transaction Amount (if applicable)
 - (g) Detailed description of the issue along with evidences (screenshots, video etc)
- I.4 Each of these complaints shall be assigned a unique service reference number (Ticket Number) which shall be shared with the Customer/Counterparty for future reference and monitoring purpose.
- I.5 Appropriate steps will be taken to arrange for the necessary resolution via discussion with technology teams, risk management teams, acquiring bank and merchant partners, etc.

I.6 For Customer grievances that cannot be addressed by EximPe, the Customer/Counterparty shall be redirected to the relevant Bank/Payment Gateway for appropriate action. These complaints could be related to product liability, delivery, fraud claims (i.e., matters beyond the scope of EximPe).

J. GRIEVANCE REDRESSAL AND RESOLUTION

EximPe shall have a three-tier escalation mechanism for handling Customer grievances. For Customer grievances that cannot be addressed by EximPe, the Customer shall be redirected to the relevant Bank/Payment Gateway for appropriate action. These complaints could be related to product liability, delivery, fraud claims (i.e., matters beyond the scope of EximPe).

Escalation Level	Designation	Resolution Time	Contact
Level 1	Customer Service Team	3 Business Days	support@eximpe.com
Level 2	Operations Head	3 Business Days	batul@eximpe.com
Level 3	Nodal Officer	3 Business Days	syed@eximpe.com

The Customer can approach the Ombudsman in case appropriate resolution is not received at previous levels within 30 days in line with RBI Guidelines - Integrated Ombudsman Scheme, 2021.

J.1 Level I (Primary Level) – Customer Service Team

EximPe has a Customer Service Team responsible for handling Customer complaints. Customers can contact the Customer Service team on any of the channels mentioned in Section G. The Customer care and helpline number can be accessed between 9:00 AM - 5:00 PM on bank working days

(a) Acknowledgement:

Complaints received by email, Freshdesk support ticket, Whatsapp or through the helpdesk numbers (channels mentioned above in Section G) shall be acknowledged within 24 hours by an immediate system generated response or via individual emails to the extent possible. The customer will also be kept informed of the action taken, the progress while redressing grievances, and/or, the reasons for delay if any, in redressing. The indicative turnaround time for acknowledgement is 2 hours. The customer can track updates on their request using the link attached to the ticket number that will be mentioned in the communication E-mails

(b) Resolution:

The Customer Service Team shall initiate follow up queries (if needed) within 48 hours of complaint being registered. All complaints received will be resolved within 3 working days. In case any complaint takes more than the specified resolution time, the Customer will be intimated accordingly and kept updated on the progress / status of the complaint on a periodic basis till such time that the complaint is not resolved. All of this would be available within the complaints reference number in our systems.

(c) Escalation:

In case the customer does not receive a response within the specified time at Level I or if the customer is unsatisfied with the response received from the organization, the customer may escalate the complaint to the next level as indicated below.

J.2 Level II (Secondary Level) – Operations Head

Unresolved complaints or complaints with unsatisfactory solution can be escalated to the Operations Head as below:

Name: Batul Huzefa

Designation: Operations Head

Address: EximPe, WeWork Express Towers, Nariman Point, Marine Drive Mumbai, Maharashtra, India 400021

Email: batul@eximpe.com

Ph: +91 74001 65311

(a) Acknowledgment:

All escalations received would be acknowledged within 24 hours. The customer will also be kept informed of the action taken, the progress while redressing grievances, and/or, the reasons for delay if any, in redressing. The turn around time or expected time for resolution will also be communicated to the Customer. The indicative turnaround time for acknowledgement is 2 hours. The customer can track updates on their request using the link attached to the ticket number that will be mentioned in the communication E-mails

(b) Resolution:

A resolution for all escalations would be provided within 3 working days. In case any escalation takes more than the specified resolution time, the customer will be intimated accordingly and kept updated on the progress / status of the escalation on a periodic basis till such time that the escalation is not resolved. All of this would be available within the escalation reference number in our systems.



Note: Customer/Counterparty will be required to approach Level II with a previous Service Request Number/ Ticket Number. The complaint history will be accessible by the team using such Service Request Number.

(c) Escalation:

In case the customer does not receive a response within the specified time at Level II or if the customer is unsatisfied with the response received from the organization, the customer may escalate the complaint to the next level as indicated below.

J.3 Level III (Third Level) – Nodal Officer

The Customer can escalate the matter to the Nodal Officer on the following details:

Name: Syed Arief Ulla

Designation: Nodal Officer

Address: EximPe, WeWork Express Towers, Nariman Point, Marine Drive Mumbai, Maharashtra, India 400021

Email: syed@eximpe.com

Ph: +91 86602 59150

(a) Acknowledgment:

All escalations received would be acknowledged within 24 hours. The customer will also be kept informed of the action taken, the progress while redressing grievances, and/or, the reasons for delay if any, in redressing. The indicative turnaround time for acknowledgement is 2 hours. The customer can track updates on their request using the link attached to the ticket number that will be mentioned in the communication E-mails

(b) Resolution:

A resolution for all escalations would be provided within 3 working days. In case any escalation takes more than the specified resolution time, the customer will be intimated accordingly and kept updated on the progress / status of the escalation on a periodic basis till such time that the escalation is not resolved. All of this would be available within the escalation reference number in our systems.

Note: Since this is a Level III escalation, giving a first call resolution on the phone might not be possible. Customer will be required to approach Level III with a previous Service Request Number. The complaint history will be accessible by the team using such Service Request Number.

The customer may appeal to the RBI Ombudsman under the RBI Integrated Ombudsman Scheme, 2021 that includes the purpose of the Ombudsman scheme. For additional



details and FAQs, please click: [RBI Integrated Ombudsman Scheme, 2021](#). Further, a complaint can be registered on <https://cms.rbi.org.in/cms/indexpage.html#eng>.

K. GRIEVANCE REDRESSAL MECHANISM FOR FAILED TRANSACTIONS / REFUNDS

EximPe has put in place a process to address all customer grievances in relation to failed transactions due to failure in communication links, time-out of sessions etc. (transactions charged to Customer / Buyer but not returned to the EximPe and, in turn, to Customer / Merchant, hence no services are rendered). However, if failure can be attributed to the Customer, then the same shall not qualify as a failed transaction. The Customer should ensure that the credentials are kept secured and confidential. Grievances related to failed transactions can be lodged through email or website. In the event of a consumer encountering a Failed Transaction, the Customer is advised to try again after some time provided money has not been debited from the account balance.

In instances of failed transactions where an account has been debited, Customers are advised to promptly report the issue to EximPe.

Where EximPe utilizes a payment gateway provider for executing domestic transfers, it is the responsibility of this provider to adhere to the RBI's guidelines on 'Harmonization of Turnaround Time (TAT) and Customer Compensation for Failed Transactions' as outlined in the RBI circular DPSS.CO.PD No. 629/02.01.014/2019-20 dated September 20, 2019.

Customers should use the established complaint registration channels and escalation matrix as detailed in Sections G and H of this document. EximPe collaborates closely with the payment gateway provider to ensure timely resolution of these issues, in compliance with the specified RBI timelines.

L. CHARGEBACK RESOLUTION

A normal chargeback is a charge for goods or services not received by the buyer / Customer and his bank debited to his credit or debit card account. The buyer / Customer has the option to file a chargeback for the same with his card issuing bank. In the case of Export Import Transactions involving goods and services with SWIFT payments, a chargeback can be considered as the buyer requesting a reversal of the amount due to a variety of reasons.

L.1 Indian Importers:

- (a) Notification: EximPe will inform the international supplier (counterparty) about the chargeback via email/telephone, providing details like payment ID and chargeback reason.
- (b) Documentation Request: The Customer will be asked to provide the trade contract.

- (c) Review and Response: The counterparty must review the chargeback claim and detail the event chain.
- (d) If goods/services are not delivered, the counterparty must confirm if the Customer is still willing to accept them.
- (e) If delivered, proofs like delivery documents and invoices are required.
- (f) For other concerns, third-party experts might be involved for dispute validation.
- (g) Resolution: Based on trade contract conditions, a final resolution will be executed.
- (h) Duplicate payments will be refunded.

L.2 Indian Exporters:

- (a) Notification: EximPe notifies the Customer about the chargeback raised by the counterparty.
- (b) Documentation and Review: Same steps as followed with regards to Indian importers.
- (c) Resolution: Similar process as followed for Indian importers, with additional requirement for the customer to provide necessary documents for bank processing. EximPe will represent the dispute on the Customer's behalf.

L.3 Timelines and Communication:

- (a) Each step in the chargeback process will have a specified timeline, ensuring prompt resolution.
- (b) Use standardized communication templates for consistency.
- (c) The dispute validation process and required documentation will be clearly outlined.

M. SOME REGULARLY OCCURRING ISSUES AND THE PROCESS OF DEALING WITH THEM

- (a) SWIFT advice not generated on same day - Customer can submit a ticket with details mention in point H.2. EximPe's support team will follow up with the partner bank which processed the transaction and provide the SWIFT advice as soon as possible.

- (b) Account not debited yet after booking rate - Customer can submit a ticket with details mentioned in point H.2. EximPe's support team will follow up with the partner bank and ensure the account is debited and transaction occurs on the same day
- (c) Credit Advice not available after successful credit of the account - Customer can submit a ticket with details mention in point H.2. EximPe's support team will follow up with the partner bank and ensure the credit account is provided as soon as possible.
- (d) Debit Advice not available after successful debit of the account - Customer can submit a ticket with details mention in point H.2. EximPe's support team will follow up with the partner bank and ensure the debit advice is provided as soon as possible.
- (e) Extra charges debited by the Bank - Customer can submit a ticket with details mention in point H.2. EximPe's support team will follow up with the partner bank, understand the reason for extra charges and resolve the issue.
- (f) Trade documents have issues/errors - Customer can re-submit the correct documents on the EximPe platform

EximPe may require the Customer to produce a set of supporting documents for resolving disputes. These could include but are not limited to:

- (i) Trade Documents - BOE/PI/SB/BoL
- (ii) Trade Contracts
- (iii) Debit Advise
- (iv) Credit Advise
- (v) SWIFT Copy

N. REPORTING REQUIREMENTS

Following reports shall be submitted to the Board on an annual basis:

- (a) Statement of all complaints received along with an analysis of the complaints
- (b) Root cause analysis of the top five complaints category
- (c) Results of annual survey of customer satisfaction
- (d) Gaps in implementation of code of conduct towards customers
- (e) Changes required in products/ services/ procedures to improve customer service

- (f) Position of complaints against the Company with Banking Ombudsman (BO) and Consumer courts (if any)
- (g) Any adverse reporting in media with respect to customer servicing
- (h) Any customer service impact due to unplanned downtime of IT systems or failure of business continuity plans

O. RECORD KEEPING

In line with Master Direction – Know Your Customer (KYC) Direction, 2016, EximPe shall preserve records of Customer complaints and the resolution offered shall be maintained for a minimum period of five years from the date of resolution. EximPe shall evolve a system for proper maintenance and preservation of complaint records in a manner that allows data to be retrieved easily and quickly whenever required or when requested by the competent authorities.

P. POLICY REVIEW

The policy is reviewed on an annual basis and updated to incorporate changes as per RBI Guidelines. All updates/changes to the Policy will be communicated to the relevant staff/relevant stakeholders on a periodic basis. All such changes /modifications will be reported to the Board for approval.

In the event of any conflict between the provisions of this policy and applicable RBI guidelines or any other statutory enactments, rules, the provisions of the applicable RBI guidelines or statutory enactments, rules shall prevail over and automatically be applicable to this policy and should be read in tandem with the provisions of the policy. The relevant provisions of the policy would be amended/modified in due course to make it consistent with the applicable law. Any deviations from the procedures specified in this policy shall be permitted only with the approval of Nodal Officer. However, no approvals shall be granted where such a deviation results in breach of any circular, direction, order or guidelines issued by any regulatory authority including the RBI.