

1. PREAMBLE

Pay Point India Network Private Limited (“the Company”) is authorized by the Reserve Bank of India (“RBI”) under the Payment and Settlement Systems Act, 2007 (PSS Act) to issue and operate Prepaid Payment Instruments (PPIs).

This Customers Grievance Redressal Policy (“Policy”) is framed in line with:

- RBI Master Directions on Issuance and Operation of Prepaid Payment Instruments in India (as amended),
- Ombudsman Scheme for Digital Transactions, 2021,
- Consumer Protection Act, 2019,
- Information Technology Act, 2000, and
- Other applicable laws with respect to customer protections, if any.

The objective of this Policy is to establish a fair, transparent, accessible, efficient, and timely grievance redressal framework to protect customers’ interests and comply with RBI guidelines.

2. DEFINITIONS

- “Company”** means Pay Point India Network Private Limited, a company incorporated under the provisions of the Companies Act, 1956, and engaged in issuance and operation of Prepaid Payment Instruments (PPIs).
- “Customer” / “Complainant”** means and includes any holder or user of a PPI issued by the Company who raises a grievance or lodges a complaint with the Company.
- “Grievance” / “Complaint”** means an expression of dissatisfaction, whether written or verbal, made by a Customer in relation to the services, transactions, or conduct of the Company.
- “Query”** means a request for information, support, or clarification from a Customer, which may not necessarily constitute a grievance or complaint.
- “Nodal Officer”** means and includes the officer appointed by the Company in accordance with the provisions of the RBI Master Directions on Issuance and Operation of Prepaid Payment Instruments and other applicable guidelines, responsible for overall supervision and monitoring of grievance redressal.

3. GUIDING PRINCIPLES OF THE GRIEVANCE REDRESSAL MECHANISM

The Company shall follow the guiding principles set out below in establishing and operating its Grievance Redressal Mechanism:

- a. Transparency – The Company shall ensure that Customers are provided with clear and accurate information regarding the channels available to service their requirements and resolve their issues. The indicative turn-around time (TAT) for grievance redressal, including investigation and resolution, shall be communicated to Customers in a transparent manner.
- b. Accessibility – The Company shall make available multiple published channels of communication to enable Customers to conveniently avail services, raise grievances, and seek assistance.
- c. Escalation – The Company shall provide Customers with information on the process of escalation of grievances to the next level of authority in the event that they are not satisfied with the resolution provided at the first level. Such information shall be displayed on the Company's website, at its branches, and through its customer support helpline/call centre.
- d. Customer Education – The Company shall make continuous efforts to educate Customers regarding the Company's products and services, thereby enabling them to make informed choices and minimizing errors in retailer-assisted transactions.
- e. Review – The Company shall maintain structured forums at various levels to periodically review the nature of grievances received, assess the quality of resolutions provided, and identify opportunities to further enhance the standard of customer service.
- f. Quick Resolution – The Company is committed to addressing all complaints and concerns of Customers promptly. The Policy clearly defines and distinguishes between complaints and queries to ensure efficient handling. The Company shall further undertake to provide round-the-clock support through its Web Robot software / AI Tools (24x7) for the convenience of its Customers.

4. COMPLAINT MECHANISM

A. Channels:

- Customer care
- E-mail
- Write to the postal address of the Company
Write to us (Mobile application)
- Contact us (Website)
- Through Mobile / Web Application

B. Time Frame for Response:

The turn-around-time for the responding to a complaint is

- ◊ Normal cases (other than the one mentioned below): 2 working days for normal cases.
- ◊ Fraud cases, Legal cases and cases which need retrieval of documents and exceptionally old records: 15 working days and
- ◊ Cases involving 3rd party (other channel partners): 5 working days.
- ◊ If any case needs additional time, the team will inform the customer the reasons of delay in resolution and provide expected time lines for resolution of the issue

C. Complaint Reference Number:

Customer shall be provided with a complaint number when he/she submits a complaint to the customer care.

D. Escalation Mechanism:

Following is the escalation matrix to resolve the complaints:

Sr. No.	Escalation Level	Point of Contact	Designation	Email	Contact No.
1	Level 1	Support	Customer Care	customer.support@paypointindia.net (mailto:customer.support@paypointindia.net) cards@paypointindia.net (mailto:cards@paypointindia.net)	022 4063 3333
2	Level 2	Team Leader	Sr. Executive Customer Care	Level2_Digikhata@paypointindia.net (mailto:level2_Digikhata@paypointindia.net)	022 4063 3333

To report fraud / unauthorized activity:

Sr. No.	Escalation Level	Email	Contact No.
1	Level 3	level3_Digikhata@paypointindia.net (mailto:level3_Digikhata@paypointindia.net)	022-4063 3344/22

E. To Escalate Complaint in Person:

If the customer's issue is not resolved even after contacting various complaint resolution channels, he/she can write to the Level 3 Officer Mr. Aditya Shinde (Contact No. 022-40633344/22).

In the absence of revert from Level 3 within 10 working days, you can further escalate the matter to Nodal officer Mr. Bhupendra M. Patel (Contact No. 022- 40508832), A Wing, 203, Supreme Business Park, Hiranandani Garden, Powai, Mumbai 400076 Maharashtra - India or you can write us on nodalofficer@paypointindia.net (mailto:nodalofficer@paypointindia.net) and expect a revert in 10 working days.

F. Penalty:

The Company expects all Customer Care Officers and Level 2, Level 3 and Nodal Officer to strictly adhere to the prescribed Turn-Around Time (TAT) for grievance redressal. Any lapse in adherence shall attract disciplinary measures as outlined below:

- i. First Seven (7) Complaints in a Month – A First Warning Letter shall be issued to the concerned Customer Care Officer, and the Officer shall be mandatorily nominated for retraining to improve service standards.
- ii. Next Seven (7) Complaints in the Same Month – A Second Warning Letter shall be issued to the concerned Customer Care Officer, with a final opportunity to demonstrate compliance with the prescribed TATs.
- iii. Further Seven (7) Complaints in the Same Month – The concerned Customer Care Officer shall be subject to termination of employment, as repeated failure to adhere to TATs is considered a material breach of duty.
- iv. Level 2 / Level 3 Officer and Nodal Officer – Any of these found failing to adhere to TATs or neglecting responsibilities shall be subject to appropriate disciplinary action as may be decided by the Board of Directors, which may include warning, suspension from the such position, or removal.

G. Standard Turn Around Time (TAT) for Broad level of Queries / Complaints:

Mentioned below is the range of TATs applicable for Complaints or queries within a broad classification.

Query / Complaint Classification	Turn Around Time (In Working Days)	Remarks
OTP related	1-2	Queries / Complaints in case of OTP not received by the customer.
Card reload issue	2-3	Queries / Complaints by customers trying to reload the card from the retailer portal.
Error while generating a cash card	2-4	Complaints of cases where retailer is not able to create a card through retailer portal.
IFSC code not reflecting	1-2	Queries / Complaints where IFSC code is not reflecting while making transactions.
Fraudulent use	7-10	Queries / Complaints pertaining to card used by unauthorised person.
Not able to use card/Wallet	2-4	Queries / Complaints pertaining to usage of the card or block in the card.
Change in Address/Phone no	2-4	Queries / Complaints pertaining to change in address or phone no of the cash card
Resetting of password	1-2	Queries / Complaints in case of resetting password.
Transaction Related	7-10	Queries / Complaints on unsuccessful NEFT/POS transactions (including claimed transactions)/prepaid card transactions
Third Party Product Related	4-7	Queries or complaints pertaining to booking and recharge related product.
Staff / Customer Service Related	5-7	Queries or complaints pertaining to Information/status provided by customer service staff.
Delay in loading of card	2-4	Queries / Complaints pertaining to reload the card

5. HARMONISATION OF TURN AROUND TIME (TAT) AND CUSTOMER COMPENSATION FOR FAILED TRANSACTIONS.

To establish customer confidence and bring in uniformity in processing of the failed transactions a framework for TAT for failed transactions and compensation therefor has been finalized by DPSS vide circular DPSS.CO.PD No.629/02.01.014/2019-20I. Please refer below link for the circular.

<https://rbidocs.rbi.org.in/rdocs/notification/PDFs/CIRCULAR677EC931A7A65E4D99AA957D8E85BC0A2A.PDF>

6. CUSTOMER CARE CENTER TIMINGS

The Company shall ensure that the Customers are served 24*7 be it in manual form i.e. by Customer care executive or in any Robotic / AI form i.e. by any system generate assistance methods.

Moreover the Customer care executives shall assist the Customers as per below timings:

09:00 AM to 09:00 PM (Monday to Saturday except second Saturday); and

10:00 AM to 6:30 PM (Sundays and Second Saturday except Public holidays as may be announced / notified by the RBI, from time to time).

7. CUSTOMERS' LIABILITY IN CASE OF FRAUD

A customer shall be liable for the loss occurring due to unauthorised transactions in the following cases:

- a) In cases where the loss is due to negligence by a customer, such as where he has shared the payment credentials, the customer will bear the entire loss until he reports the unauthorised transaction to the Company.
- b) In cases where the responsibility for the unauthorised electronic banking transaction lies neither with the bank nor with the customer, but lies elsewhere in the system and when there is a delay (of four working days after receiving the communication from the bank) on the part of the customer in notifying the bank of such a transaction, the per transaction liability of the customer shall be limited to the transaction value.

8. CUSTOMERS GRIEVANCE REDRESSAL COMMITTEE

The review & audit of complaints shall be done by the Customers Grievance Redressal In accordance with the provisions of the Reserve Bank of India (RBI) Master Directions on Issuance and Operation of Prepaid Payment Instruments (PPIs), and other applicable regulatory guidelines, the Company shall constitute a Customers Grievance Redressal Committee ("the Committee").

- **Composition of the Committee**

The Committee shall consist of such minimum number of members as may be prescribed under the Reserve Bank of India (RBI) Master Directions on Prepaid Payment Instruments (PPIs) and any other applicable laws, rules, regulations, and guidelines, as amended from time to time. The Company shall ensure that the constitution of the Committee is always in compliance with the prevailing regulatory framework, including the requirement to designate a Nodal Officer for grievance redressal and to provide an effective escalation mechanism for customer complaints.

As on date, the Customer Grievance Redressal Committee of the Company is constituted as under:

1. Mr. Ketan C. Doshi
2. Mr. Rajeev Lal
3. Mr. Naresh K. Rathod
4. Mr. Bhupendra M. Patel

- **Scope and Functions of the Committee**

The Customer Grievance Redressal Committee (“the Committee”) shall discharge the following functions in accordance with the RBI Master Directions on Issuance and Operation of Prepaid Payment Instruments (PPIs), the Ombudsman Scheme for Digital Transactions (OSDT), 2019 (as amended from time to time), and other applicable regulatory requirements:

- 1) Review and establish a grievance redressal mechanism in concurrence with the responsible product managers.
- 2) Ensure timely and effective implementation of all regulatory requirements regarding customer service, in line with the RBI Master Directions on PPIs and other applicable guidelines.
- 3) Have the authority to call for and examine all relevant records from the Customer Care Centre and, where necessary, from the customer, to enable effective resolution of complaints.
- 4) Review and recommend simplification of existing procedures and practices of the Company, with the objective of safeguarding the interests of customers.
- 5) Periodically review the regulations and procedures prescribed by RBI for customer service and evaluate whether the same are being adopted in both letter and spirit by the Company, and make suitable recommendations for rationalization.
- 6) Monitor prevalent industry practices and procedures in the prepaid payment solutions sector and recommend corrective or preventive actions on an ongoing basis.
- 7) Proactively advise and guide the Customer Care Centre on the resolution of pending complaints and systemic improvements.

- **Meetings and Reporting**

- a. The Committee shall meet at least once every quarter to review grievance redressal performance, TAT adherence, and root-cause analysis of major complaints.
- b. A consolidated report of grievances, resolutions, and corrective actions shall be placed before the Board of Directors on a quarterly basis, in compliance with RBI requirements.
- c. The Committee shall also ensure that details of grievance redressal channels, escalation matrix, and the contact details of the Nodal Officer are displayed on the Company's website, mobile application, and other public communication platforms, as mandated by RBI.

9. Disclosure/Display of this Policy

- a) An extract / full copy of this Grievance Redressal Policy shall be made available on the Company's official website, in a prominent and easily accessible manner.
- b) Details of the grievance redressal and escalation matrix, including the contact details of the Nodal Officer and escalation authorities, shall be displayed prominently at all customer-facing points, including branches, partner outlets, and digital platforms, in accordance with RBI Master Directions and applicable regulations.

10. REVIEW AND AMENDMENTS

- This Policy shall be reviewed annually or earlier if necessitated by regulatory changes.
- Amendments shall be approved by the Board.

11. APPROVAL

This KYC Policy of **Pay Point India Network Private Limited** has been reviewed and approved by the **Board of Directors** in its meeting held on **August 26, 2025**, and shall remain effective until amended or replaced by a subsequent resolution.