



Fair Practice Code and Grievance Redressal Mechanism
of
Aashiyana Financiers Services Private Limited
(Erstwhile Thrivenest Advisors Private Limited)



PART A - FAIR PRACTICE CODE

1. Introduction

This Fair Practices Code lays down transparent and clear guidelines regarding the transactions of the Aashiyana Financiers Services Private Limited (“the Company” or “Aashiyana Financiers”) with its customers and lending partners. This Policy is applicable for all lending products offered by the Company. The code also places a robust mechanism for Customer Grievance Redressal. Through this code the Company aims to adhere to the regulatory guidelines prescribed by the regulator from time-to-time.

2. Applications for loans and their processing

We will ensure that our Lending Partner’s loan application forms shall include relevant/ necessary information which affects the borrower’s interest to bring fair practice and transparency to enable the borrower a meaningful comparison with the terms and conditions offered by other Companies and arrive at an informed decision. This form shall indicate the documents required to be submitted by the borrower along with the application form.

Communication with the borrower shall take place in a language that can easily be understood by the borrower or in the vernacular language through digital/ physical mode. The communication, during any stage of the loan cycle, shall be done with the borrower on the details (address; email; mobile number) registered in the Company records. It shall be the responsibility of the customer to get the latest details updated with the Company. After the receipt of the application form from the borrower, an acknowledgment receipt indicating the period within which the loan applications will be disposed of, shall be handed over to the borrower.

3. Loan appraisal and terms and conditions

Aashiyana Financiers, upon approval of the loan form lending partner, shall convey the applicant through a sanction letter cum agreement or otherwise indicating the amount of loan, annualized rate of interest applicable and method of application thereof, along with the other terms and conditions.

The sanction letter shall be delivered by lending partner in writing to the borrower and an accepted copy of the terms & conditions duly signed by the borrower shall be maintained on record. The lending partner shall also provide a Key Fact Statement (KFS) to all prospective borrowers to help them take an informed view before executing the loan contract, as per the standardised format prescribed. Penal charges levied for the late repayment of instalments shall be mentioned in bold in the loan agreement.

The lending partner shall furnish a copy of the loan agreement, along with all the enclosures quoted in the loan agreement to the borrowers at the time of sanction/disbursement of loans.

4. Disbursement of loans and changes in terms and conditions

In the event of any alteration/ modification in the terms & conditions including interest rates, disbursement schedules, prepayment charges, service charges etc., a notice/ intimation shall be provided to the borrower and Aashiyana Financiers by lending partner. Any modifications in charges and interest rates shall be effected only prospectively and a suitable condition/ clause in this regard shall be incorporated in the loan agreement.

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5. Release of Securities

All securities pertaining to the loan would be released on receipt of full and final payment of the outstanding amount of loans, subject to any legitimate right or lien, and set-off for any other claim that the lending partner and Aashiyana Financiers may have against the borrowers. If such right of set-off is to be exercised, the borrower shall be given notice through digital/physical mode on the details registered with the lending partner and Aashiyana Financiers containing full particulars about the remaining claims and the conditions under which the Company is entitled to retain the securities until the relevant claim is settled / paid.

6. General

There shall not be any interference in borrower's affairs except for reasons mentioned in the loan agreement's terms & conditions unless any new information, which the borrower has not disclosed earlier, has been noticed by the Company.

Aashiyana Financiers will not discriminate on the grounds of caste, gender and religion while carrying out its lending operations. However, the Company may participate/ offer credit-linked schemes to weaker sections of the society.

Aashiyana Financiers shall not resort to harassment or use of force for the recovery of credit facilities. It will have recourse to all available means under law and as specified in the Loan Agreement for collection and recovery of its dues.

Aashiyana Financiers shall not resort to undue harassment i.e., use of the muscle power for the recovery of the loans, persistently bothering borrowers at odd hours etc., for recovery of loans and such behaviour is also against the Company's Code of Conduct. The Company may connect with the customers at the timings suitable to them and communicated to the Aashiyana Financiers Officials during regular visits for collection of dues.

Ongoing training to all the staff members who communicate with the clients shall be imparted to ensure that they behave with the customers in an appropriate manner. The quantum of penal charges shall be reasonable and commensurate with the non-compliance of material terms and conditions of loan contract without being discriminatory within a particular loan/product category.

7. Interest Charged from Borrowers

To ensure that there the Customers are not charged excessive interest rate and charges on loans and advances by the lending partner or Aashiyana Financiers, a Policy for determining Interest Rates, Processing and Other Charges and the same has been put up on lending partner's website. The information published on the website or otherwise published shall be updated whenever there is a change in the rates of interest.

8. Review

The Company shall abide by this Fair Practices Code following the spirit of the Code and in the manner it may be applicable to its business.

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PART A - CUSTOMER GRIEVANCE REDRESSAL POLICY

1) Introduction

Customer focus is one of the core values of Aashiyana Financiers. The Company has a holistic approach towards setting up service standards and continuously improving customer experience based on customer feedback received through various channels. The Company aims to ensure quick and effective handling of customer grievances, as well as prompt corrective & preventive action (including correction of the process, wherever required) to avoid recurrence.

2) Objectives

The objective of the policy is to spell out the framework for Customer's Grievance Redressal in the Company, to ensure that:

- ✓ Our primary objective is to consistently achieve high levels of customer satisfaction by delivering exceptional products and services while exceeding customer expectations.
- ✓ All customers are treated fairly and in an unbiased manner at all times.
- ✓ All grievances raised by customers are dealt with courtesy and as per defined timelines.
- ✓ Customers are made aware of avenues to escalate their grievances within the Company and their rights to escalate further if they are not satisfied with the Company's response.
- ✓ The Company will address all complaints efficiently and fairly.
- ✓ The Company employees shall deal with the grievances in good faith and without prejudice.
- ✓ To prevent escalation of complaints directly to our partners.

3) Scope

The Company has put in place a structured, meaningful, and effective mechanism for redressal of customer complaints. It ensures that the complaint is redressed in fair manner & within the given framework of rules and regulation. The policy document is available at all branches and the employees are aware about the complaint handling process. The policy is also available on the Company's website.

4) Principles of Grievance Redressal:

The guiding principles of the approach to grievance redressal are as follows:

- I. **Accessibility:** The Company shall provide various avenues to customers (such as Branch, helpline number, email ids, etc.) to register their grievances, as well as assist them in escalating their grievances at appropriate forums within the Company.
- II. **Acknowledgment of Grievances:** The Company shall acknowledge the receipt of complaints received through various channels and will communicate the turn-around- time for complaints to be redressed. The Company shall arrange to communicate the resolution within the defined time frame.

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- III. Transparency in Resolution of Grievances: The Company shall examine the customer's grievance in a transparent manner, while ensuring timely communication of resolution to the customer

5) Types of Complaint:

- ✓ **Health Insurance Related Complaints:** The complaints under this category shall be taken care by ABM/BM/ASM/CSM. The BCM shall record and register the Complaint and collect documents from the customers. The BCM shall send intimation of all complaint related documents to HO team. The BCM shall follow up and resolve complaints, also satisfy the clients through Sales team.
- ✓ **Death Case Related Complaints:** The complaints under this category shall be taken care by ABM/BM/ASM/CSM. The BCM shall record and register the Complaint and collect documents from the customers. The BCM shall send intimation of all complaint related documents to HO team. The BCM shall follow up and resolve complaints, also satisfy the clients through Sales.
- ✓ **Loan Amount related complaints:** The complaints under this category shall be taken care by ABM/BM/ASM/CSM and Accounts department. The BCM shall forward clients details, along with loan amount through an email to Accounts department for the purpose of loan statement.
- ✓ **Other Complaints:** Complaints other than the above category shall be taken care by concerned person of all the departments. The Auditor may investigate the complaints on need basis.

6) Key steps of customer grievance redressal mechanism:

- ✓ **Complaint Submission:** The customers having any query/complaint may submit their concern to the Company through various channels such as verbally, by phone or by email. The Company shall ensure that the complaint submission process is accessible and well-publicized.
- ✓ **Complaint Registration:** On receipt of a complaint, the complaint will be registered with the grievance redressal officer. This typically involves recording of relevant details such as complainant's name, contact information, nature of the complaint, date of submission, customer loan ID, employee code, division name, cluster name etc.
- ✓ **Investigation:** The concerned team shall initiate enquiry into the complaint, diligently collect pertinent information, examining any accompanying documents, and, if necessary, reach out to the customer for additional clarifications. The investigation will be conducted meticulously, ensuring fairness and impartiality throughout the process.
- ✓ **Resolution:** Based on the findings of the investigation, the concerned team shall take the appropriate action for resolution of the complaint. This could involve corrective measures or any other necessary action to address the complaint.

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- ✓ **Documentation:** Throughout the entire complaint resolution process, it is important for the company to maintain detailed records of each complaint, including the steps taken, findings, resolutions, and any communication exchanged with the customer. This documentation helps ensure accountability and allows for future reference if needed.
- ✓ **Continuous Improvement:** The Company shall have a customer grievance redressal committee to review the nature of customer grievances received and give its recommendations to the Board to strengthen the complaint redressal mechanism in the Company and enhance the quality of customer services and reduce customer grievances in the first instance by improved policies, processes, and trainings.

7) Mode of Complaint:

The customers may submit their queries/complaints in writing, verbally or telephonically. The customers can submit their written and verbal enquiries to any of staff who meets them at any forum such as centre meetings, CGT, GRT, and Branch.

- (i) **Field Level/ Village Level:** The customers may submit their complaints via telephone, verbally and in writing to any employee. The concerned employee shall register customer grievance in branch grievance register.
- (ii) **Branch Level:** The customers may submit their complaints in the following ways at branch level:

A. Complaint Box:

Each branch of the company has a complaint box, Clients who have complaints or concerns can write them down and drop the complaint in the designated complaint box at the respective branch of the Company. The auditor is responsible for keeping the key to the complaint box securely and for checking the complaint box every week. The auditor will record the complaint and forward it to the concerned staff as per the relevance of the complaint.

B. Complaint Register:

Customers visiting branches for any query/service request or grievance will interact with Branch Manager. The Branch Manager will record the complaint in the branch Complaint Register and provide solution to the complainant.

- (iii) **HO Level**

Aashiyana Financiers has set up a contact number (85-0399-0399), email info@aashiyanafin.com for its customers to address any query/concern or register any complaint. Customers can call the number provided on display in branches or call on the number provided on the website to register their complaints. There is also a dedicated Grievance Redressal Officer to receive, record and forward any complaint received to the concerned department. Grievance redressal Officer is also responsible for follow-ups and resolution of the grievances.

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The contact details of the Grievance Redressal Officer are provided herein below:

Grievance Redressal Officer

Name: Mr. Gopal Sigh Rajawat

Mail ID- info@aashiyanafin.com

Contact No.: 98296-64866

8) Documentation of grievances:

- (i) **Village/field level:** The Clients should register their complaints to the concerned employee of the Company via telephone, orally or in writing. The employee shall register customer's grievance in branch grievance register and ensure that each entry in the register is unique and sequentially numbered for reference.
- (ii) **Branch level:** BM have to record customer's complaint in the register and also maintain an excel file with the complainant's name for customer (mention loan id), contact information, nature of complaint and date of complain submission, Division name, cluster name, branch name and code etc. and ensure that the data in the Excel file is regularly updated. BM shall intimate all grievances to the grievance officer on or before the 2nd day of each month.
- (iii) **HO level:** In head office, on receipt of a complaint, the Grievance redressal officer shall record it in the register and maintain a softcopy with the complainant's name for customer (mention loan id), contact information, nature of complaint and date of complain submission, division name, cluster name, branch name and code etc.

9) Investigation of grievances:

- A. **Branch level:** Branch level complaints will be investigated by business team and audit team. Proper checking of grievance registers and sign of BCM. Firstly, BCM and BM solve grievances. Later on, the complaint will be handled by their reporting manager/ Superior. Reporting manager will investigate the complaint by interacting with the clients and they will also inform to the grievance redressal officer & audit team and solve within TAT.
- B. **HO level:** HO level complaint will be investigated by Grievance redressal officer, business team and audit team. Complaints received through toll contact number (85-0399-0399), e-mail l'd info@aashiyanafin.com at head office, the grievance redressal officer will try to connect with concerned departments as per the requirement and complaint details will be mailed to the concerned department and they will investigate and revert it. After receiving the revert from team, it will be shared with senior management and approval will be taken for closure of the grievance/complaint. All the above procedure will be conducted by keeping in loop the risk and audit team.

10) Monitoring & Review Mechanism:

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Branches will have a complaint box where customers can submit their complaints. Further, a complaint register is maintained at the branches in which, all the complaints received, via call or in written, will be recorded. Every week, Area Manager will consolidate and forward the details of all complaints and their resolution status to Grievance redressal Officer via email.

The ASM/CSM/RSM will consolidate and forward the details of all complaints and their resolution status to Grievance redressal Officer via email every week. Grievance redressal Officer will consolidate the details received and will forward the same to senior management. This should mandatorily include the status of the resolution and highlight the complaints pending for resolution. On monthly basis, the Audit executive will audit whether all the complaints have been reported to the Grievance redressal Officer in a timely manner.

11) Consolidation of grievances

Client registered her complaint through verbally/phone/written to any employee of Aashiyana Financiers All Complaint should be registered in complaint/grievance register at branch. BCM collect all data of Complaint from branch in pre-defined excel format, and send to grievance team at HO. Grievance team, required to data as on 2nd date every month from Area Manager. After Consolidation of all data (Branch and HO) will send to Management team by 7th of following month.

12) Training of Operating Staff on handling complaints:

All Operating Staff are properly trained to handle customer complaints. During the interaction with customers, differences of opinion and areas of friction can arise. Imparting soft skills required for handling irate / agitated customers is an integral part of the training programs for staffs. The Company ensures that the internal machinery for handling complaints / grievances operates smoothly and efficiently at all levels.

13) Mandatory display at the offices

The Company displays the following information prominently, for the benefit of its customers, at its every place of business:

The name and contact details (Telephone / Mobile nos. / email address) of the Grievance Redressal Officer who can be approached by the customer for resolution of complaints against the Company.

14) Reporting to Board of Directors

Summary of the customer grievance reports along with actions initiated would be reported to the Board at least once in a year. The report shall contain information like, the total no. of complaints received, disposed of and pending, with reasons thereof, which will be placed before the Board for information / guidance.

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15) Reporting to Lending Partner

Within 15 days from the receipt of a complaint from the customer, Aashiyana Financiers shall report the details of such complaint to the respective lending partner. Further, in case no customer complaints are received during a particular month, Aashiyana Financiers shall submit a NIL complaint report to the lending partner on a monthly basis for record and compliance purposes.

16) Review and Renewal

This policy will be reviewed periodically to ensure its effectiveness and alignment with regulatory requirements and industry best practices and any necessary updates or revisions may be made accordingly by the compliance and policy department. The updated policy will be placed for board approval at least once in a year.



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Annexure I

STEP 1: Channel of Complaint Registration

1) Branch

Customer shall contact to any branch for any grievance where the Branch Manager shall be the first point of communication with the customer,

2) Customer Care Centre

The customer can also call to the centralized customer care staff on 85-0399-0399. The Branch, on behalf of customer can also communicate the same to the centralized customer care. Contact details of centralized customer care desk is also displayed in each branch office.

3) Write to us

The customer can also communicate with us by emailing us on info@aashiyanafin.com or raising their concern on our website at <https://aashiyanafin.com/contact>.

STEP 2: Escalation Mechanism

Resolution in Step 1 not as per your expectations	In case the dispute/complaint is not redressed within fifteen days	In case the dispute/complaint is not redressed within one month/or the redressal is not acceptable to the complainant
First Level	Second Level	Third Level (Appeal to RBI)
Mr. Gopal Sigh Rajawat, Grievance Redressal Officer, 517, Mansarovar Plaza, Madhyam Marg, Agarwal Farm, Mansarovar, Jaipur, Rajasthan – 302020 E-Mail: info@aashiyanafin.com Contact: 97733-18108	Mr. Devendra Sharma, Principal Nodal Officer, 517, Mansarovar Plaza, Madhyam Marg, Agarwal Farm, Mansarovar, Jaipur, Rajasthan – 302020 E-Mail: pno@aashiyanafin.com Contact: 85-0399-0399	General Manager, Centralized Receipt and Processing Centre Reserve Bank of India, 4th Floor, Sector 17, Chandigarh – 160017 Toll Free Number: 14448 (9:30 am to 5:15 pm) Portal to lodge complaints: https://cms.rbi.org.in https://sachet.rbi.org.in/

The above-mentioned Grievance Redressal Mechanism shall be displayed eminently, for the customers' benefit, at our branches and company website.

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Annexure II

Time Frame / Escalation:

The Company will always make effort to redress the complaints of the customers / investors / employees/Third Party Service Provider at the earliest and in the best possible way and provide its best services. In the event of non-disposal of complaint by the Grievance Redressal Officer, the same will escalate to the Nodal officer, who would take steps to resolve the same expeditiously.

i. All efforts will be made to resolve each complaint received generally within the stipulated time as per the following escalation matrix:

Level	Official	No. of working days
First	Grievance Redressal Officer	15
Second	Nodal Officer	30

ii. There may be some complaints which require deeper analysis from all possible angles which may cause delayed resolution of the complaint. In such cases, Company will try to resolve the grievances at the earliest, depending on the nature of the case. Such delay in addressing the complaint beyond the prescribed time limit shall be conveyed to the complainant along with reasons for the same.

iii. If the resolution of complaint is delayed beyond 1 month (30 days) of receipt, or the Customer is not satisfied with the reasons of delay conveyed to him/ her, then He/ She may file a complaint with Ombudsman either through the complaint lodging portal of the Ombudsman at <https://cms.rbi.org.in> or at following address:

physical address of CRPC, Chandigarh as below:

Reserve Bank of India, 4th floor, Sector 17, Chandigarh, 160017

RBI Contact Centre – 14448

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