

**XANDER FINANCE PRIVATE LIMITED ('THE COMPANY')
OMBUDSMAN SCHEME FOR NON-BANKING FINANCIAL COMPANIES**

**DATE OF REVIEW: REVIEWED BY THE BOARD OF DIRECTORS ON MARCH 27,
2024**

1. Background:

Xander Finance Private Limited (“XFPL” or “the Company”) is a non-deposit accepting Non-Banking Financial Company (‘NBFC’) registered with Reserve Bank of India (‘RBI’) vide NBFC registration no. B-13.02083. Further, as per the Master Direction-Reserve Bank of India(Non-Banking Financial Company-Scale Based Regulation), Directions, 2023 dated October 19, 2023, XFPL is being classified as Base layer NBFC having customer interface and not availing public funds. The Company provides end to end credit solutions including advisory services, deal structuring, financing, and workouts to investors, developers, asset owners, private equity owners and large corporations across a range of industries.

The Company during its ordinary course of business transacts with various customers/ borrower for advancing loans. At times, a customer/ borrower who is dissatisfied with the services of the Company may want to escalate the matter and thus may wish to reach out to an authorised representative of the Company. In order to provide a suitable mechanism for receiving and addressing complaints of the customers / borrowers and to have a redressal mechanism in place, the Reserve Bank of India (‘RBI’) had introduced an Ombudsman Scheme for Non-Banking Financial companies, 2018. Pursuant to the notification ref. CEPD. PRD. No.S873/13.01.001/2021-22 dated November 12, 2021, RBI, being satisfied that it is in public interest to do so, and to make the alternate dispute redress mechanism simpler and more responsive to the customers of entities regulated by it, RBI has integrated the three existing Ombudsman schemes as follows:

- (i) the Banking Ombudsman Scheme, 2006, as amended up to July 01, 2017;
- (ii) the Ombudsman Scheme for Non-Banking Financial Companies, 2018; and
- (iii) the Ombudsman Scheme for Digital Transactions, 2019

The above ombudsman schemes have been merged into “the Reserve Bank - Integrated Ombudsman Scheme, 2021” (hereinafter referred to as ‘the Scheme’).

This scheme is applicable to Non-Banking Financial Companies (‘NBFCs’) as defined under Section 45-I(f) of the Reserve Bank of India Act, 1934 and registered with RBI under Section 45-IA of the Reserve Bank of India Act, 1934 which:

- (a) are authorised to accept deposits; or
- (b) have customer interface, with assets size of Rupees One hundred crore or above, as on the date of the audited balance sheet of the previous financial year.

Since the Company is a non-deposit accepting NBFC having customer interface and has an asset size of more than Rupees One hundred crore, the said policy is hereby amended to include the

directives of the Scheme. All the terms shall have the same meaning and reference as specified in the Scheme.

2. Objectives:

Following objectives are sought to be achieved by this Scheme:

- To provide for a system of ombudsman for redressal of complaints against deficiency in services concerning deposits, loans and advances and other specified matters by RBI;
- To provide a cost-free and expeditious complaint redressal mechanism to the complainant relating to deficiency in the services of the Company;
- To provide for an appellate mechanism under which the complainant / Company has the option to appeal against the decision of the ombudsman before the appellate authority;
- To facilitate satisfaction and settlement among the complainant and the Company;
- To promote conducive credit culture among the Company.

3. Salient features of the Reserve Bank - Integrated Ombudsman Scheme, 2021 issued by RBI:

The salient features of the Reserve Bank - Integrated Ombudsman Scheme, 2021 issued by RBI is enclosed as [Annexure-A](#).

4. Details of Nodal Officer of the Company and RBI Ombudsman:

The details of the RBI Ombudsman and Nodal Officers of the Company as per 'the Reserve Bank - Integrated Ombudsman Scheme, 2021' are enclosed as [Annexure-B](#).

5. The Reserve Bank - Integrated Ombudsman Scheme, 2021:

The Reserve Bank - Integrated Ombudsman Scheme, 2021 is enclosed as [Annexure-C](#). The previous Ombudsman Scheme for Non-Banking Financial Companies, 2018 is repealed by RBI.

Salient features of “The Reserve Bank - Integrated Ombudsman Scheme, 2021”

A] Applicability of the Scheme

Scheme covers customers of NBFCs (excluding housing finance companies, core investment company, infrastructure debt fund NBFC, NBFC-infrastructure finance company, a company in resolution or winding up / liquidation or any other NBFC specified by RBI) which:

- are authorised to accept deposits;
- have customer interface with assets size of Rupees One hundred crore or above, as on the date of the audited balance sheet of the previous financial year

B] Grounds for filing a complaint by an aggrieved customer or through authorised representative

- Any customer aggrieved by an act or omission of a Regulated Entity resulting in deficiency in service may file a complaint under the Scheme personally or through an authorised representative as more specifically defined under the Scheme.

C] Procedure to file a complaint

- The complaint may be lodged online through the portal: <https://cms.rbi.org.in>
- The complaint can also be submitted via electronic mode or physical mode to:
Centralised Receipt and Processing Centre (CRPC)
Reserve Bank of India, 4thFloor,
Sector 17, Chandigarh – 160017
Email ID: crpc@rbi.org.in
- The concerned NBFC must provide a reply to the customer complaint within 30 (thirty) days from the date of receipt of the complaint.
- In case no reply is received from the NBFC or the customer remains dissatisfied with the reply of NBFC and he has not approached any other judicial authority / forum, he may file a complaint with the RBI Ombudsman within 1 (one) year from the date of receipt of reply from the concerned NBFC.

D] How does Ombudsman take decision?

- Proceedings before Ombudsman are summary in nature.
- Promotes settlement through conciliation → If not reached, can issue Award/Order.

E] Can a customer appeal, if not satisfied with decision of Ombudsman?

- Yes, If Ombudsman’s decision is appealable → Appellate Authority: Executive Director in-charge of Department of RBI.
- Appellate Authority’s Secretariat shall scrutinise and process the Appeal.
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Details of the RBI Ombudsman and Nodal Officers of the Company

Name – Designation- Address & Contact details	Zone / Area of operation
<p>Mr. Tariq Chinoy Xander Finance Private Limited 101, 5 North Avenue, Maker Maxity, Bandra Kurla Complex, Mumbai – 400051, Maharashtra Tel no: 022 - 61196010 Fax: 022 – 61196080 Email: info@xanderfinance.com</p>	West
<p>Mr. Priyanka Khanna, Head – Asset Management</p> <p>Xander Finance Private Limited L-47, LGF, Lajpat Nagar-II, New Delhi -110024 Tel no: 022 – 61196010 Fax: 022 – 61196080 Email: info@xanderfinance.com</p>	North & East
<p>Mr. Srinivasan J, Senior Vice President (Principal Nodal Officer)</p> <p>Xander Finance Private Limited The Hive at VR Chennai, Level 3, VR Chennai, PillaiyarKoli Street, Jawaharlal Nehru road, Anna Nagar, Chennai – 600040, Tamil Nadu Board: 044-66540100 Fax: 022-61196080 Email: info@xanderfinance.com</p>	South

For details, regarding address and area of operation of RBI Ombudsman, please refer to:
<https://rbi.org.in/Scripts/AboutUsDisplay.aspx?pg=BankingOmbudsmen.htm>

Particulars	Date of adoption/review/revision
Adoption	May 15, 2019
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