Grievance Redressal Policy for Merchants and End Consumers

FACILE CREDIT SOLUTIONS PRIVATE LIMITED (FacilePG) | CIN: U67100DL2021PTC375468

Objective

The Reserve Bank of India (RBI), vide notification dated 17th March 2020 bearing reference number RBI/DPSS/2019-20/174 DPSS.CO.PD.No. 1810/02.14.008/2019-20, as consolidated and updated by the Master Direction on Payment Aggregators and Payment Gateways (“PA Guidelines / PA Master Direction”), has laid down regulations for Payment Aggregators (PA) to ensure that a suitable mechanism is in place for receiving and addressing complaints from Merchants and end consumers, with specific emphasis on resolving such complaints fairly and expeditiously regardless of the source of the complaint.

This policy document lists the various means available for our Merchants and End Consumers to reach out to us, our service commitment, and the timelines within which we will endeavour to ensure resolution of concerns. This policy covers all services offered by FACILE CREDIT SOLUTIONS PRIVATE LIMITED (hereinafter referred to as “FacilePG”) as a Payment Aggregator – Online (PA-O), and is aligned with the RBI PA-O Guidelines, the PA Master Direction, PCI DSS, and CERT-In directions.

Scope

This policy is applicable to all products and services offered by FacilePG under its Payment Aggregator (PA-O) services – including payment collection and settlement (payout) services – and should be read in conjunction with the related operational guidelines issued from time to time.

Applicability

The policy document covers the grievance redressal mechanism and the procedures the Company follows when a complaint arises. It applies to the Customer Service Team, the Grievance/Nodal Officer, and other employees of the Company relating to the grievance redressal process, and is applicable to all customers catered to by FacilePG across all products and services offered by the Company as a Payment Aggregator.

Key Definitions

- **End Consumer** – the end customer purchasing goods/services from Merchants by making payment via different payment instruments.
- **Merchant** – a legal entity with whom FacilePG has entered into a Merchant Agreement for the purpose of providing payment aggregation services.
- **Customer** – includes a Merchant or an End Consumer, or both.
- **RBI** – the Reserve Bank of India.
- **PA Guidelines / PA Master Direction** – the RBI Guidelines / Master Direction on Payment Aggregators and Payment Gateways, as amended from time to time.

Guiding Principles

- FacilePG strives to provide secure and efficient solutions and services to meet the needs of its customers.
- Grievances will be addressed promptly and courteously.
- The Company will take adequate steps to resolve issues in a timely manner.
- All customers will be treated fairly and equally at all times.
- Customers will be informed about the various channels to lodge/escalate their complaints and concerns.
- No charge will be levied for filing a complaint, and no fee will be collected for resolving an issue.

- All employees will act in good faith and without prejudice to the interests of the customer.

Grievance Escalation Matrix

Level 1 – Customer Support

Queries, requests or complaints submitted through the Contact Us section on our website www.facilepg.com, or received over phone (+91 99581 28170) or email (info@facilepg.com), will be acknowledged promptly. Our executives will respond within 5 (five) working days and endeavour to ensure that all grievances are redressed as early as possible. If a matter requires more than the specified time, the customer will be kept updated on the progress at regular intervals until resolution.

Level 2 – Grievance Officer

If the customer is not satisfied with the resolution provided at Level 1, or there is a breach of the applicable service-level timelines, the concern may be escalated to:

Grievance Officer	Mr. Anuj Verma
Company	FACILE CREDIT SOLUTIONS PRIVATE LIMITED
Address	Unit No. 306, 3rd Floor, R.G Trade Tower, Netaji Subhash Place, Pitampura, Delhi - 110034
Email	support@facilepg.com
Phone	+91 99581 28170

On receiving the escalation, the complaint will be responded to within 5 (five) working days. If it takes longer, the customer will be kept updated periodically against an escalation reference number until resolved.

Level 3 – Nodal Officer

If the customer does not receive a response within the specified time at Level 2, or remains dissatisfied, the concern may be escalated to the highest level:

Nodal Officer	Dr Sukhdeep Singh
Company	FACILE CREDIT SOLUTIONS PRIVATE LIMITED
Address	Unit No. 306, 3rd Floor, R.G Trade Tower, Netaji Subhash Place, Pitampura, Delhi - 110034
Email	nodal@facilepg.com

On receiving the escalation, the complaint will be responded to within 5 (five) working days, with periodic updates until resolution.

If the customer does not receive a satisfactory response even after Levels 1, 2 and 3, the customer may approach the Ombudsman under the Reserve Bank of India – Integrated Ombudsman Scheme, 2021 (as amended from time to time), within the timelines prescribed thereunder.

Harmonisation of Turn Around Time (TAT) and Customer Compensation for Failed Transactions

Failures may occur on account of factors not directly attributable to the customer, such as disruption of communication links, time-out of sessions, or non-credit to the beneficiary account. Rectification / compensation for such 'failed' transactions is governed by the RBI framework for auto-reversal and compensation, summarised below:

Sl.	Description of the incident	Timeline for auto-reversal	Compensation payable
1	**Card Transactions** – account debited but the beneficiary account/merchant not credited or confirmation not received (Card-to-card, PoS, Card-Not-Present/e-commerce).	Auto-reversal (R) within T+1 to T+5 days (as applicable to the channel).	■100/- per day of delay beyond the prescribed timeline.
2	**Immediate Payment System (IMPS)** – account debited but beneficiary account not credited.	Auto-reversal by beneficiary bank latest on T+1 day.	■100/- per day if delay is beyond T+1 day.
3	**Unified Payments Interface (UPI)** – account debited but beneficiary not credited, or confirmation not received at merchant location.	Auto-reversal within T+1 to T+5 days (as applicable).	■100/- per day beyond the prescribed timeline.

End consumers who do not receive redress of the failure as defined in the TAT may register a complaint with the Reserve Bank of India under the Integrated Ombudsman Scheme, 2021 (as amended).

Our Response Time

Type of Query	Turn Around Time (in days)
Uncaptured payment refund	1 day
IMPS/NEFT refund	7 days
End-consumer feedback	2 days
Auto-revert of unsettled payments	15 days
PA-related	30 days

Customer Liability in the Event of an Unauthorised Payment Transaction

In accordance with, and subject to, applicable RBI guidelines and directions, a customer's liability arising out of an unauthorised electronic payment transaction processed through the FacilePG payment aggregation platform will be limited as follows:

Particulars	Maximum liability of customer
Contributory fraud / negligence / deficiency on the part of FacilePG (irrespective of whether or not the transaction is reported by the customer).	Zero
Third-party breach where the deficiency lies neither with FacilePG nor the customer but elsewhere in the system, and the customer notifies FacilePG within three days.	Zero
Where notified within four to seven days.	Transaction value or ■10,000/- per transaction, whichever is lower.
Where notified beyond seven days.	Decided by the Company on a case-to-case basis.
Loss due to customer negligence (e.g. sharing payment credentials) – until the customer reports the unauthorised transaction.	Customer bears the loss until reporting; loss after reporting is borne by the Company.

Chargeback Resolution

- FacilePG shall notify the Merchant by email/telephone about the chargeback or fraudulent transaction dispute raised by the end user, including the payment ID and reason for chargeback.
- The Merchant shall review the chargeback claim and provide details on the chain of events.
- Where goods/services have not been delivered, the Merchant shall confirm whether the customer is willing to accept them.
- Where goods/services have been delivered, the Merchant shall share proof of delivery, invoices, etc.
- In case of duplicate payments, the amount shall be refunded to the customer.

Training, Reporting & Record Keeping

Our support team undergoes training as necessary to ensure customer queries and grievances are handled appropriately. A statement of all complaints received, along with root-cause analysis and gaps (if any) in the code of conduct towards Merchants, shall be submitted to the Board on an annual basis. In line with applicable RBI KYC Directions, records of complaints and resolutions shall be preserved for a minimum period of five years from the date of resolution.

Force Majeure & Policy Review

The Company shall not be liable for any failure or delay in performance under this policy due to force-majeure events including but not limited to fire, flood, lightning, explosion, war, embargo, act or failure to act of any governmental authority, epidemics, pandemics, systems failure, technical mishaps or strikes. This policy is reviewed on an annual basis and updated to incorporate changes as per RBI Guidelines; all such changes are reported to the Board for approval.