

## Grievance Redressal Policy

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## **1. Introduction**

RBI vide notification dated 17 March 2020 bearing reference number RBI/DPSS/2019-20/174 DPSS.CO.PD.No. 1810/ 02.14.008/2019-20 (“PA Guidelines”) has laid out regulations for all Payment Aggregators (PA) to ensure that a suitable mechanism is in place for receiving and addressing complaints from its Merchants with specific emphasis on resolving such complaints fairly and expeditiously regardless of source of the complaints.

This Grievance Redressal Policy has been formulated to provide Merchants and Customers adequate facilities to lodge and escalate their grievances, concerns and queries with Hitachi Payment Services Pvt. Ltd. (HPY) PA (hereinafter referred to as the “company”) and to provide a speedy and effective redressal mechanism for the same.

For the purpose of this Grievance Policy:

- i. A merchant means a user of HPY PA’s aggregation services
- ii. A customer is known as who is making payment to Merchants for product or service
- iii. A grievance means any gap in the promised and delivered service levels which may be technical or communicative errors.

## **2. Principles of Grievance Redressal**

- i. HPY PA believes in human centric innovation and strives to provide secure and efficient solution and service to solve the needs of merchants/customers.
- ii. The grievances will be dealt promptly and courteously.
- iii. The Company shall take adequate steps to resolve any issue faced by a Merchant and in a timely manner.
- iv. All Merchants are to be treated fairly and equally at all times.
- v. Merchants shall be made aware of the various channels to lodge/escalate their complaints, concerns and grievances within HPY PA.
- vi. No charge shall be levied for filing a complaint
- vii. The company shall not collect any fee towards resolution of the issue.
- viii. The company shall constantly work towards devising newer and smarter mechanisms to receive and redress grievances quickly
- ix. All employees of the Company shall work in good faith and without prejudice to the interests of the Merchants.

## **3. Applicability**

The policy document shall cover the details of grievance redressal mechanism and the procedures the employees at the Company need to follow when such a complaint arises. The policy will apply to Customer Service Team, Senior Manager – Customer Support and Operations VP of the Company and shall be applicable to all customers catered to by HPY PA. The policy will cover all the products and services offered by the Company as a payment aggregator.

## **4. Team Sensitization on handling complaints**

Our teams undergo regular training to ensure that merchants’ queries and grievances are handled in an appropriate manner. They are encouraged to work in a manner which helps us in offering a first-time resolution and in turn build the consumer trust and confidence. This reflects in both the operations as well as the merchant communications.

## 5. Governance Framework

### 5.1 Grievance Redressal Committee:

The company's Grievance Redressal Committee shall conduct meetings on a monthly basis to study complaints/ suggestions, etc. from the customers. The purpose will be to evolve ways and means of improving the quality customer service. The Committee shall also be responsible for reviewing details and types of complaints, number, nature, systematic deficiencies noticed etc., and the time taken by the Company to resolve the said complaints. While examining the customer complaints data, the Committee shall also review staff accountability aspects.

### 5.2 Nodal Officer:

A Senior Manager or Vice president shall be designated as the Nodal Officer who will look after the implementation of directions received from the high-level committees in regard to customer service and complaint handling mechanism. The Nodal Officer shall be responsible for representing the company and for furnishing information to the Ombudsman in respect of complaints filed against the company. Details of the nodal officer for customer grievance shall be prominently displayed on the website. The nodal officer shall report to the senior management of the company. Customer Service Team shall support the Nodal officer.

## 6. Registration and Tracking of Complaints

- i. Based on the nature of the ticket, the complaints shall be classified into different buckets. Merchants/ Customers can reach out to HPY PA through any of the below listed channels:

Channel Name	Contact Details
Email	<a href="mailto:care.pg@hitachi-payments.com">care.pg@hitachi-payments.com</a>
Customer Care/ Helpline number	18604191775

- ii. For complaints relating to chargeback and settlement, Merchants can reach out to HPY PA by sending details of their complaints on:

Chargeback queries	<a href="mailto:dispute.pg@hitachi-payments.com">dispute.pg@hitachi-payments.com</a>
Settlement Queries	<a href="mailto:recon.pg@hitachi-payments.com">recon.pg@hitachi-payments.com</a>

- iii. Merchants/Customers will be required to necessarily provide the following details while communicating with the Company:

- Customer/ Merchant name
- Merchant ID/ Terminal ID
- Transaction date and Time

- Product Type
  - Complaint details and
  - Contact Number and Email ID
- iv. Each of these complaints shall be assigned a unique reference number which shall be shared with the Merchant/ Customer for future reference and monitoring purpose.
- v. 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.
- vi. For Customer grievances that cannot be addressed by HPY PA, the Customer shall be redirected to the relevant Merchant for appropriate action. These complaints could be related to product liability, delivery, fraud claims (i.e., matters beyond the scope of HPY PA).

## 7. **Grievance Redressal and Resolution**

HPY PA shall have a three-tier escalation mechanism for handling Merchant and Consumer grievances. Below given is the escalation matrix and resolution time details for Grievance Redressal:

Escalation Level	Designation	Resolution Time	Contact
Level I	Customer Service Team	5 business days	<a href="mailto:care.pg@hitachi-payments.com">care.pg@hitachi-payments.com</a> 18604191775
Level II	Manager – Customer Support	5 business days	<a href="mailto:pgescalations@hitachi-payments.com">pgescalations@hitachi-payments.com</a> 044-66367806
Level III	Nodal Officer	5 business days	<a href="mailto:pgnodalofficer@hitachi-payments.com">pgnodalofficer@hitachi-payments.com</a>

The Merchant/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.

### 7.1 **Level I – Customer Service Team**

**Acknowledgement:** Complaints received by email or through the helpdesk numbers shall be acknowledged within 24 hours by an immediate system generated response or via individual emails to the extent possible. The Merchant 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 TAT or expected time for resolution will also be communicated to the Merchant.

**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 5 working days. In case any complaint takes more than the specified resolution time, the Merchant 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.

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

## 7.2 Level II –Manager - Customer Support

Merchant can address the grievance to the below address for escalations:

Balasubramanian P  
Manager-Operations  
Hitachi Payment Services Private Limited  
7th floor, MPL Silicon Tower, Velachery,  
Tambaram Main Road, Chennai -600100, Tamil Nadu, India  
Email: [pgescalations@hitachi-payments.com](mailto:pgescalations@hitachi-payments.com)  
Ph: 044-66367806

**Resolution:** All escalations received would be acknowledged with 24 hours and a resolution would be provided within 5 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: Merchant/Customer will be required to approach Level II with a previous Service Request Number.*

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

## 7.3 Level III – Nodal Officer

The Merchant can escalate the matter to:

Sumanta Roy  
VP – Operations (Nodal Officer)  
Hitachi Payment Services Private Limited  
7th floor, MPL Silicon Tower, Velachery  
Tambaram Main Road, Chennai -600100, Tamilnadu, India  
Email: [pgnodalofficer@hitachi-payments.com](mailto:pgnodalofficer@hitachi-payments.com)

**Resolution:** All escalations received would be acknowledged with 24 hours and a resolution would be provided within 5 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 phone might not be possible. Merchant/Customer will be required to approach Level II with a previous Service Request Number.*

## 8. Grievance Redressal Mechanism for Failed Transactions

HPY PA has put in place a process to address all customer grievances in relation to failed transactions. In the event of a consumer encountering a Failed Transaction, the consumer is advised to try again after some time provided money has not been debited from the account balance. However, in case of a Failed Transaction where account has been debited, the consumer is advised to raise a failed transaction grievance immediately in the manner provided below. The consumer can contact the customer service agents through the channels mentioned above.

As per RBI Guidelines, HPY PA has taken steps to introduce Online Dispute Resolution (ODR) System for resolving customer disputes and grievances pertaining to digital payments, using a system driven and rule-based mechanism with zero or minimal manual intervention.

Failed transaction grievances are resolved in accordance with the RBI circular DPSS.CO.PD No. 629/02.01.014/2019-20 dated September 20, 2019 on “Harmonization of Turn Around Time (TAT) and customer compensation for failed transaction using authorized Payment Systems.”

The modes for registering complaints and Escalation Matrix shall be same as mentioned in [Section 6 and 7](#). All the complaints will have to be resolved within the timelines as specified by the RBI TAT Circular.

## **9. Chargeback Resolution**

Chargebacks are considered high priority issues. HPY has the following process to resolve issues relating to disputes/chargebacks

- i. HPY PA shall notify the Merchant by email/telephone about the chargeback dispute raised. Details such as the payment ID and the reason of chargeback shall be provided.
- ii. Merchants shall be requested to review the chargeback claim and provide details on the chain of events that took place.
- iii. In case the goods/services have not been delivered, the Merchant shall review the issue and confirm if the Customer is willing to accept the goods/services.
- iv. In case the goods/services have been delivered, the Merchant will be required to share the proof of deliveries, invoices, etc.
- v. In case of a duplicate payments, HPY PA shall request the bank to refund the amount back to the Customer.
- vi. The Merchant shall be requested to share all the documents as per the requirement of the bank. HPY PA shall represent the dispute on the Merchant’s behalf.

## **10. Reporting Requirements**

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

- i. Statement of all complaints received along with an analysis of the complaints
- ii. Root cause analysis of the top five complaints category
- iii. Results of annual survey of customer satisfaction
- iv. Gaps in implementation of code of conduct towards Merchants
- v. Changes required in products/ services/ procedures to improve customer service
- vi. Position of complaints against the Company with Banking Ombudsman (BO) and Consumer courts (if any)
- vii. Any adverse reporting in media with respect to customer servicing
- viii. Any customer service impact due to unplanned downtime of IT systems or failure of business continuity plans

## **11. Record Keeping**

In line with Master Direction – KYC Direction, 2016, HPY PA shall preserve records of Merchant complaints and the resolution offered shall be maintained for a minimum period of five years from the date of resolution. The Company 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.

## 12. 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.