

Grievance Redressal Policy **PAYTM PAYMENTS SERVICES LIMITED (PPSL)**

V1.2

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PAYTM PAYMENTS SERVICES LIMITED (PPSL)

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Grievance Redressal Policy

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Version History

Version	Version Date	Description	Approved by	Approved Date
1.0	Sep, 2021	Initial Policy for PPSL	Board	September 8, 2021
1.1	Dec 31, 2022	<ul style="list-style-type: none">•Level 3 has been incorporated in the grievance redressal mechanism wherein the complainant has been given the option to reach RBI Ombudsman, if required.•Inclusion of format for the Customer compensation for failed transactions and its TAT using authorised Payment Systems.•Details of Nodal Officer has been updated in the policy.•Frequency of the review and approval details of this Policy are clearly documented as 'atleast on an annual basis'.•The amendments in the policy are based on learnings of the process reviews.	Board	January 20, 2023
1.2	Jan 2024	<ul style="list-style-type: none">•Based on the learning of process reviews and regulatory requirement resolution timelines of L1 has been revised to below:<ul style="list-style-type: none">- For complaints received on account of unsuccessful/failed transaction : 4 Working Days- For other complaints : 5- 7 working days	Board	January 16, 2024

Grievance Redressal Policy

Table of Contents

1. Introduction	4
2. Objective	4
3. Governance Structure	4
4. Terms of Reference	4
5. Redressal Mechanism	4
6. Review	5
7. Failed Transactions	5
Annexure 1	9

Grievance Redressal Policy

1. Introduction

Paytm Payment Services Limited ("PPSL") is a payment aggregator / payment gateway that helps merchants collect payments from their end-customers.

2. Objective

This policy outlines a structured grievance redressal mechanism available to customers for escalating their complaints with PPSL. PPSL will ensure to deal with all complaints in a transparent and timely manner.

3. Governance Structure

Oversight Framework: The Board of Directors of PPSL will be responsible for the overall compliance to this Policy and Compliance Team will act as a custodian to this policy. Each line of businesses are responsible for their respective processes as detailed in this policy and its related Standard Operating Procedures ("SOPs") updated from time to time (Annexure 1)

SOP approval matrix for the policy:

- i. Policy related changes - Policy owner, Compliance, Legal, Finance, Technology, Other SMEs, as specified in the respective SOPs.
- ii. Operational related Changes – Head Risk, Policy Owner, Other SMEs, as specified in the respective SOPs.

4. Terms of Reference

- a) "Complaint" means a representation in writing or through other modes as specified in this policy, alleging deficiency in service on the part of PPSL and seeking relief thereto.
Further, complaints shall not include enquiries or request received from the customers.
- b) "Complainant" can be a customer lodging complaint with PPSL.
- c) "Customer / Merchant" refers to the merchant on boarded by PPSL on platform to use PPSL's payment solution to collect payments from end-customers.
- d) "Ombudsman" Scheme refers to Integrated Ombudsman Scheme issued by Reserve Bank of India.

5. Redressal Mechanism

Level 1: Merchant Care Executive

If the Complainant has a grievance, they can connect with the support team via the Paytm merchant application or the Paytm merchant dashboard.

Alternatively, complainant can also reach via email at pg.support@paytmpayments.com

Resolution Time*:

- a. For the complaints emanate on account of unsuccessful or failed transactions, the timeline for resolution shall be 4 working days. Wherein a 'failed transaction' is a transaction which has not been fully completed due to any reason not attributable to the customer such as disruption of communication links, timeouts of session and non-credit to beneficiary's account due various causes.
- b. For any other complaints, resolution shall be provided within 5 to 7 working days from the date of receipt of the complaint by PPSL.

Grievance Redressal Policy

Level 2: Grievance Officer

If timely resolution is not provided at Level 1 or Complainant is not satisfied with the resolution provided, the customer may escalate the complaint to the Nodal Officer.

The Nodal Officer shall ensure that an effective resolution* is provided to the customer within 15 working days from the date of escalation of grievance.

The details of Nodal Officer are as under:

Name of the Principal Nodal Officer: Mr. Anubir Singh Anand

Email id: nodal.officer@paytmpayments.com

**Resolution time does not include time taken by the Complainant to provide required information/documentation.*

If any case / transaction is related to a third party or outside the PPSL, then the TAT will be dependent on the respective Partner Banks/Network Providers etc. Resolution time will include this TAT along with the PPSL's internal resolution time.

In exceptional circumstances, where PPSL is unable to reach a conclusion within 15 working days, PPSL will respond with a rationale and indication as to when a final response can be expected, which will be within 30 business days of PPSL receiving the complaint.

The Complainant must approach Level 2 with a previous Service Request Number on which the PPSL did not respond or satisfactory response was not provided. This is to ensure that the Complainant gets correct resolution in a timely manner.

Acknowledgement and Tracing of Complaints:

The PPSL shall provide an automated ticket number (Service Request Number) at each level to enable the complainant to track status.

PPSL aims to acknowledge the complaints promptly post receiving the complaint.

Level 3: Lodging Complaint with RBI Ombudsman:

If any Complainant is not satisfied with response/ resolution of PPSL, he/she can reach to Ombudsman with his/her complaint or resort to other legal avenues for grievance redressal under Integrated Ombudsman Scheme as issued by RBI.

Link to log a complaint : <https://cms.rbi.org.in>

6. Review

The Company shall implement a risk based internal audit program where the relevant risks and controls are independently tested. This mechanism shall also verify the compliance with the Policy and other applicable laws and regulations (once in a two years period). A summary report of the internal audit shall be presented to the Audit Committee or Board members

7. Failed Transactions

Turn Around Time Turnaround Time (TAT) and Customer compensation* for failed transactions using authorised Payment Systems shall be in compliance with the time as specified under RBI Circular DPSS.CO.PD No.629/02.01.014/2019-20 dated September 20, 2019.

Grievance Redressal Policy

**If any amount has been held back due to internal risk parameters/ assessment and the merchant has been duly informed on the same, then the penalty/ fines as per below table shall not be applicable.*

Grievance Redressal Policy

Turn Around Time (TAT) and customer compensation for failed transactions using authorized Payment Systems

Sl. no.	Description of the incident	Framework for auto-reversal and compensation	
		Timeline for auto-reversal	Compensation payable
I	II	III	IV
1	Card Transaction		
a	Point of Sale (PoS) (Card Present) including Cash at PoS Account debited but confirmation not received at merchant location i.e., charge-slip not generated.	Auto-reversal within T + 5 days.	₹100/- per day of delay beyond T + 5 days.
b	Card Not Present (CNP) (e-commerce) Account debited but confirmation not received at merchant's system.		
2	Immediate Payment System (IMPS)		
a	Account debited but the beneficiary account is not credited.	If unable to credit to beneficiary account, auto reversal (R) by the Beneficiary Bank latest on T + 1 day.	₹100/- per day if delay is beyond T + 1 day.
3	Unified Payments Interface (UPI)		
a	Account debited but transaction confirmation not received at merchant location (payment to merchant).	Auto-reversal within T + 5 days.	₹100/- per day if delay is beyond T + 5 days.
b	Account debited but the beneficiary account is not credited (transfer of funds).	If unable to credit the beneficiary account, auto reversal (R) by the Beneficiary Bank latest on T + 1 day.	₹100/- per day if delay is beyond T + 1 day.
4	Aadhaar Enabled Payment System (including Aadhaar Pay)		
a	Account debited but transaction confirmation not received at merchant location.	Acquirer to initiate "Credit Adjustment" within T + 5 days.	₹100/- per day if delay is beyond T + 5 days.
b	Account debited but beneficiary account not credited.		
5	Aadhaar Payment Bridge System (APBS)		
a	Delay in crediting beneficiary's account.	Beneficiary bank to reverse the transaction within T + 1 day.	₹100/- per day if delay is beyond T + 1 day.
6	National Automated Clearing House (NACH)		
a	Delay in crediting beneficiary's account or reversal of amount.	Beneficiary bank to reverse the uncredited transaction within T + 1 day.	₹100/- per day if delay is beyond T + 1 day.
b	Account debited despite revocation of debit mandate with the bank by the customer.	Customer's bank will be responsible for such debit. Resolution to be completed within T + 1 day.	
7	Prepaid Payment Instruments (PPIs) – Cards / Wallets		

Grievance Redressal Policy

a	<u>Off-Us transaction</u> The transaction will ride on UPI, card network, IMPS, etc., as the case may be. The TAT and compensation rule of respective system shall apply.		
b	<u>On-Us transaction</u> Beneficiary's PPI not credited. PPI debited but transaction confirmation not received at merchant location.	Reversal effected in Remitter's account	

The aforesaid TAT shall be complied by PPSL to the extent applicable and may get affected due to dependencies on external factors or third parties which are beyond control of PPSL.

Annexure 1

Reference

This Policy shall be read in continuation with the below SOPs. This is an indicative list of the SOPs supporting the Grievance Redressal Policy and are subject to change as per the defined approval matrix-

1. Nodal Complaints Management
2. Post Live_MHD
3. Chargeback (Risk Ops)

Regulatory Reference

- Integrated Ombudsman Scheme as issued by RBI: Ref. CEPD. PRD.No.S873/13.01.001/2021-22 dated November 12, 2021
- Guidelines on Regulation of Payment Aggregators and Payment Gateways issued by RBI: circular DPSS.CO.PD.No.1810/02.14.008/2019-20 dated March 17, 2020
- RBI Circular on Harmonisation of Turn Around Time (TAT) and customer compensation for failed transactions using authorised Payment Systems: DPSS.CO.PD No.629/02.01.014/2019-20 dated September 20, 2019.
- RBI Circular on Online Dispute Resolution (ODR) System for Digital Payments DPSS.CO.PD No.116/02.12.004/2020-21 dated August 6, 2020.