

Juspay Technologies Private Limited

CUSTOMER (MERCHANT) GRIEVANCES REDRESSAL POLICY

Background

Juspay Technologies Private Limited (hereinafter referred as 'Juspay' or 'the Company') develops payment solutions for online merchants and financial institutions. It offers merchants an API unification layer to connect with multiple payment system providers. Further, the Company offers Juspay Safe, a mobile payments browser which is designed/developed to improve transaction time and increase success rate by simplifying the 2 factor authentication. It also provides solutions like developing UPI PSP stacks for banks and managing payments page of merchants.

On March 17, 2020, the Reserve Bank of India ('RBI') had published Guidelines on Regulation of Payment Aggregators and Payment Gateways ('PA Guidelines'). Juspay understands that customer satisfaction is of utmost importance in the service industry. In order to deliver a high level of enriched customer experience, the Company has implemented Customer Grievance Redressal Policy ('the Policy') with the approval of its Board of Directors ('the Board'). The Policy has been put in place with an objective of enabling resolution to complaints/ concerns of the customer and minimise the recurrence of similar complaints in the future. The Policy has been drafted in line with the objectives of the Company and the PA Guidelines.

This Customer Grievances Redressal Policy is made available on the website of the Company, which can be accessed at www.juspay.in by all the Merchants.

Key Definitions

Board means Board of Directors of the Company

Customer(s)/customer(s)/Merchant(s) means company(ies) with whom Juspay has entered into Contract (Merchant Agreement) for the purpose of providing payment aggregation services.

Note - The term Customer(s) and Merchant(s) has been used interchangeably throughout this policy document.

Purpose & Objective

The reason for customer complaint can be divided into two main categories:

1. The behavioural aspects in dealing with customers
2. Inadequacy of the working/operations or gaps in standards of services expected and actual services rendered

The objective of the Policy is to minimize instances of customer complaints and grievances through proper service delivery and review mechanism apart from focusing on prompt redressal of customer complaints and grievances.

The Policy lists down key procedures to be followed while receiving, handling and responding to any grievance raised by Merchant against Juspay with respect to its payment aggregation services.

The key objectives of the Policy are outlined as follows :

1. To promote good and fair practices by setting minimum standards in dealing with customers
2. To increase transparency, so that, customers can have better understanding of what they can reasonably expect of the services
3. Complaints raised by customers are dealt with courtesy and without undue delay
4. Customers are fully informed of avenues to escalate their complaints/grievances within the Company and their rights to alternative remedy, if they are not fully satisfied with the response of the Company to their complaints
5. All complaints are dealt efficiently and fairly to avoid any damage to Company's reputation and business
6. Provide prompt and responsive complaint resolution to the Customers
7. Ensure objectivity in the complaint handling process
8. To promote a fair and cordial relationship between the customer and the Company
9. Ensure visibility and accessibility of complaint handling process to all customers

Registration of Grievance/Complaints

The Company endeavours to resolve all complaints/ grievances of their Merchants arising out of the payment aggregation services provided by the Company. For this purpose, the Company has implemented a structured grievance redressal mechanism wherein the Merchants will be able to register their complaints/ grievances through various means which are as follows :

1. Email ID: By writing an email to the email id as made available to the Merchants.
2. Letter: In writing by sending a letter to the Nodal Officer of the Company at the following address:

Talha Huma
Nodal Officer
Juspay Technologies Pvt Ltd,
444, 3rd and 4th Floor, Stallion Business Center,
18th Main Road, 6th Block, Koramangala, Bengaluru,
Karnataka 560095

3. Any other channels made available to the Merchant

Processing of Complaints

1. For complaint raised through any channel, a ticket (containing tracking number) will be created and the same will be communicated to the Merchant. The Merchant can use the ticket (containing tracking number) for the purpose of tracking the status of the complaint across all the channels that are implemented.
2. The timeline for resolution of the complaints/grievances will be governed by the Service Level Agreements executed between the Company and the Merchant ("SLAs").
3. Complaint will be registered by the Company subject to availability of appropriate details which may include the transaction reference number/ other relevant reference number, complainant's

name, address and contact details, details about the complaint, copies of supporting documents, wherever applicable.

4. In case the information is not appropriately shared by the Merchant, the Company will contact the Merchant to provide the adequate information in order to assess the issue.
5. Complaint/Grievance will be considered as closed in case the Merchant does not respond back within 7 days of the receipt of the response from the Company for seeking further details.
6. Complaints can be escalated to the next/higher level as per the escalation matrix provided under the Section “ Escalation of Grievances/ Complaints”.
7. If the complaint is not related to the deficiency at Juspay’s end, Juspay shall suitably inform and guide the Merchant to the appropriate party in the payments ecosystem.

Escalation of Grievances/ Complaints

Escalation Matrix

Level	Point of Contact	Details
1	Channels	Email ID and any other channels provided to Merchants
2	Service Assurance Officer- Malyada Goverdhan	malyada.goverdhan@juspay.in
3	Nodal Officer – Talha Huma	nodal.officer@juspay.in

Level 1

Complaint lodged by Merchant through any of the specified channels, will be handled as per the process mentioned in the Section “ Processing of Complaints”. If Merchant is not satisfied with the response/resolution provided to Merchant in accordance with the SLAs or does not receive any response from the Company within the timeline provided in the SLAs, Merchant can escalate the complaint to next level i.e. Level 2.

Level 2

Merchant can get the grievances registered by e-mailing to the Service Assurance Officer . The Service Assurance Officer shall attempt to respond within 5 working days from the date on which grievance/ complaint was filed. Merchant may request for an update on the grievance in case any grievance requires more than the specified time period. Merchant shall be kept updated on the status of their complaint(s).

Merchant shall provide the following details while raising the grievance with the Service Assurance Officer: grievance tracking number or ticket issued by Juspay, any transaction identifier, Merchant’s

name, registered address and contact details, details/description about the complaint, date of first filing complaint with Juspay, response provided by Juspay at Level 1.

If the Merchant is not satisfied with the response provided, Merchant can go for the next level of escalations.

Level 3

The Company has designated a Nodal Officer who will be responsible to provide timely resolution of the customer complaints and manage other incidental activities with respect to the grievances. If the Merchant will not be convinced/ satisfied with the resolution provided by the Company against their complaint or the complaint will still be pending and unresolved, Merchant may escalate the grievance to the Nodal Officer (details below) :

Name: Talha Huma

Designation: Nodal Officer

Address: 444, 3rd and 4th Floor, Stallion Business Center, 18th Main Road, 6th Block, Koramangala,

Bengaluru, Karnataka 560095

Contact: +91 9606864998

Email: nodal.officer@juspay.in

The Nodal Officer shall attempt to respond within 5 working days from the date on which grievance/ complaint was filed. Merchant may request for an update on the grievance in case any grievance requires more than the specified time period. Merchant shall be kept updated on the status of their complaint(s).

Merchant shall provide the following details while raising the grievance with the Nodal Officer: grievance tracking number or ticket issued by Juspay, any transaction identifier, Merchant's name, registered address and contact details, details/description about the complaint, date of first filing complaint with Juspay, response provided by Juspay at Level 1, response provided by Juspay at Level 2.

If the Merchant will be dissatisfied with the resolution provided by the Nodal Officer or the complaint will be unresolved post escalations across the three levels mentioned above, then the Merchant may directly approach the RBI for redressal of their complaints at below address:

Reserve Bank of India,

Address is available at: <https://rbidocs.rbi.org.in/rdocs/Content/PDFs/AAOOSDT31012019.pdf>

Resolution and Closure of Grievances/ Complaints

1. Upon successful resolution of their complaint, the Company will provide intimation to the Merchant.
2. The Company will aim to resolve every grievance within a period of 30 days of its registration.

3. The Company will maintain all the records of grievance / complaint received along with the details of resolution provided, if required under the applicable laws.

Exclusions

The Company will consider the complaint as closed and disposed-off in case of any of the following instances:

1. Anonymous complaints without proper supporting details;
2. Matters involving decisions in which the Merchant has not been affected either directly or indirectly;
3. Matters that are sub-judice or where any judicial authority has passed an order;
4. Cases which have been reported as fraud and/or are under investigation by government authority like Police, Tax authorities, etc. or where the authority has already taken a view on the subject matter, after investigation.

Force Majeure Events

Company shall not be liable for any failure or delay in its 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.

Policy Review

The Board will periodically review the Policy and take steps to address any changes as appropriately required by relevant regulations. The Board will review the Policy at least once in a year.