



## **GRIEVANCE REDRESSAL POLICY**

# **CDSL COMMODITY REPOSITORY LIMITED**

## **POLICY ON GRIEVANCE REDRESSAL**



## GRIEVANCE REDRESSAL POLICY

### CONTENTS

| Sr. No. | Particulars                                               |
|---------|-----------------------------------------------------------|
| 1.      | Objectives                                                |
| 2.      | Format and Manner for Filing Grievances                   |
| 3.      | Internal Machinery to handle complaints / grievances      |
| 4.      | Types of complaints handled by the CCRL                   |
| 5.      | Matters that are not considered as Complaints by the CCRL |
| 6.      | False / malicious complaints                              |
| 7.      | Closures of Grievance/ Dispute                            |
| 8.      | Grievance Recording Format                                |



## **GRIEVANCE REDRESSAL POLICY**

### **1. OBJECTIVES**

- 1.1. CDSL Commodity Repository Limited (hereinafter referred as “the CCRL” or “the Company”) believes in providing prompt and efficient services to its market participants.
- 1.2. As per clause 5 of the WDRG Guidelines on the Redress of Grievances and Resolution of Disputes, 2017, every inspection agency/repository/warehouseman shall have a Grievance Redress Policy which shall be filed with the Authority and shall also be adequately publicised.
- 1.3. Thus, to comply with the above-mentioned provisions, the CCRL has formulated this Grievance Redressal Policy (“Policy”) The Policy aims at minimizing instances of complaints and grievances through proper service delivery and review mechanism, and to ensure redressal of complaints and grievances within the prescribed time.
- 1.4. The Policy on Grievance Redressal follows the undernoted principles:
  - The CCRL shall provide services with due care and diligence and holds the information as custodian.
  - The CCRL shall provide services without discrimination in any manner.
  - The CCRL shall always treat its users fairly.
  - Complaints raised by users will be dealt with courtesy and in time.
  - Users will be fully informed of avenues to escalate their complaints / grievances within the organization and their rights to alternative remedy in case they are not fully satisfied with the response to their complaints.
- 1.5 To make the redressal mechanism meaningful and effective, a structured system will function, which will ensure that redressal is within the given legal framework.

### **2. FORMAT AND MANNER FOR FILING GRIEVANCES**

- 2.1 The user can give his complaint online via e-mail at [ccrlhelpdesk@cdslindia.com](mailto:ccrlhelpdesk@cdslindia.com). The complaint shall be resolved within a given time frame as per the WDRG Guidelines.
- 2.2 A helpdesk id and contact number for complaints is made available on the CCRL’s home page on the website - [ccrl.co.in](http://ccrl.co.in) and under ‘Contact Us’ tab. Any person may also register a grievance along with supporting evidence on the WDRG Grievance Redress System (WGRS) in such form and manner as may be specified by the Authority (WDRG). All the complaints/grievances received by the WDRG will be acknowledged by them within a time frame of 3 days.



## **GRIEVANCE REDRESSAL POLICY**

2.3 The WDRA Grievance Redress System (WGRS) will simultaneously forward all details of the grievance to the concerned respondent.

2.4 The Company will endeavour to resolve all complaints within 15 working days. The maximum time within which the Company will dispose of the grievance will be 30 days from the date of receipt as per the WDRA Guidelines on:

- Redress of Grievances and Resolution of Disputes, 2017
- Repositories and Creation and Management of Electronic Negotiable Warehouse Receipts (clause 27).

### **3. INTERNAL MACHINERY TO HANDLE COMPLAINTS / GRIEVANCES**

#### **3.1 Grievance Officer:**

As per clause 6 of WDRA Guidelines on Redress of Grievances and Resolution of Disputes, the CCRL shall designate a Grievance Officer who shall receive grievances and coordinate to ensure their successful resolution. He/she shall ensure disposal of the complaints / grievances of users, within the stipulated time and escalate within the organisation/ Authority as may be required for timely disposal.

The complaints/grievances lodged by users shall be analysed and redressed by the Grievance Officer within a period of 10 working days from the date of receipt.

#### **3.2 Grievance Escalation System:**

- Where the aggrieved party is not satisfied with the redressal provided by the respondent, it may communicate its response to the respondent through the WGRS within 10 working days.
- Where the aggrieved party is not satisfied with the response provided or where the respondent fails to respond to the aggrieved party within the specified time, the aggrieved party may escalate the grievance to the Authority through the WGRS.
- For a grievance against a warehouseman that is categorised as a 'dispute' and if the dispute is not settled amicably, disputing parties may opt for arbitration and the same shall be governed by clause 12 of WDRA Guidelines on Redress of Grievances and Resolution of Disputes.



## **GRIEVANCE REDRESSAL POLICY**

### **3.3 Grievances Redressal Committee:**

- 3.3.1 When the aggrieved party escalates the grievance to the Authority through the WGRS, the issue is then considered by the next higher authority i.e. Grievances Redressal Committee constituted as per clause 10.2 of the Bye Laws of the CCRL. The functions of the Committee will include:
- a) Deal with the complaints referred to it by commodity exchanges, clearing corporations, financial institutions, Warehousemen, Repository Participants, hear the parties and resolve their complaints.
  - b) Such other matters in the scope as may be referred by the Board of the Repository.
- 3.3.2 Where the complaints have not been resolved within the maximum period of 30 days, despite best efforts, the Grievance Redressal Committee shall escalate such cases to the Regulatory Oversight Committee of the governing board for resolution/ directions.
- 3.3.3 The Regulatory Oversight Committee shall review the complaint resolution process and status of redressal of grievances of account holders, Repository Participants, with respect to repository operations. This shall include review of complaints remaining unresolved over long period of time, estimate the adequacy of resources, amongst others.
- 3.3.4 The details on complaints received, resolved and pending, with reasons therefor will be placed before the Board periodically by the Regulatory Oversight Committee. The committee shall act upon the directions of the Board in this regard. The directions of the Board will be acted upon by the Company and compliance will be ensured.

## **4. TYPES OF COMPLAINTS HANDLED BY THE COMPANY**

The CCRL shall accept and entertain only the complaints/grievances arising out of activities undertaken by it, which broadly cover the following:

- Accounts
- Operations
- IT

(Elaborated sub categorization provided in clause 8 of this Policy – Grievance Recording Format)



## **GRIEVANCE REDRESSAL POLICY**

### **5. MATTERS THAT ARE NOT CONSIDERED AS COMPLAINTS BY THE CCRL**

- Complaints that are incomplete or not specific
- Seeking guidance/explanation
- Fee structure of the Company.
- Disputes arising out of agreements / terms with the bank.
- Complaints falling under the purview of other Regulatory Authorities.

### **6. MALICIOUS OR FALSE COMPLAINTS:**

In the event of Company receiving any malicious or false complaints, based on merits of individual cases, suitable letters will be addressed to such complainants with stern warning against their recurrence. In deserving cases, the Company may even examine instituting appropriate legal proceedings against such parties making such malicious complaints.

### **7. CLOSURES OF GRIEVANCE/DISPUTE:**

A grievance/dispute shall be considered as closed when:

- the aggrieved party has accepted the response given by the respondent.
- the aggrieved party has not communicated a response to the respondent within eight weeks of the issuance of the respondent's response.
- the aggrieved party withdraws its grievance from the WGRS.
- an order is passed by the Authority under clause 3(6), 8(4) and 12(17) and 3(6) of the WDRA Guidelines on Redress of Grievances and Resolution of Disputes



## GRIEVANCE REDRESSAL POLICY

### 8. GRIEVANCE RECORDING FORMAT:

| Year      | Category     | Sub Type                                                         | Serial Number | Assigned to | Ticket No. | Description of Issue | Complaint Received From | Complaint Received Date | Name | Email ID | Mobile No. | Status | Complaint Open/Close | Complaint Closure Date |
|-----------|--------------|------------------------------------------------------------------|---------------|-------------|------------|----------------------|-------------------------|-------------------------|------|----------|------------|--------|----------------------|------------------------|
| 2022-2023 | 1- Accounts  | 1- GST                                                           |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 1- Accounts  | 2- TDS                                                           |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 1- Accounts  | 3- Ledger                                                        |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 1- Accounts  | 4- Payment                                                       |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 1- Accounts  | 5- Outstanding                                                   |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 1- Accounts  | 6- Others                                                        |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 2- Operation | 1- Transaction Process related                                   |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 2- Operation | 2- Master Process related                                        |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 2- Operation | 3- Benpos and Reports                                            |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 2- Operation | 4- Repository Participants : Onboarding, Modification, Surrender |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 2- Operation | 5- Billing                                                       |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 2- Operation | 6- WDRA                                                          |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 2- Operation | 7- Others                                                        |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 3- IT        | 1- eNWR/eNNWR Quantity, Quality, Validity, Balance related issue |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 3- IT        | 2- Transaction related errors                                    |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 3- IT        | 3- Masters related errors                                        |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 3- IT        | 4- Benpos and Reports download and mismatch issue.               |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 3- IT        | 5- Login Issue                                                   |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |
| 2022-2023 | 3- IT        | 6- Others                                                        |               |             |            |                      |                         |                         |      |          |            |        |                      |                        |

-----XXXXXXXX-----