

WSFX GLOBAL PAY LIMITED

CUSTOMER GRIEVANCE REDRESSAL POLICY

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Document Review and Approval

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1. Overview

WSFX Global Pay Limited (“Company” / “WSFX”) believes in conducting its affairs in a fair and transparent manner, and in maintaining the highest levels of integrity, honesty and ethical conduct while dealing with its customers (“Customers”).

This Policy has been formulated in accordance with the Foreign Exchange Management Act, 1999, the Foreign Exchange Management (Authorised Persons) Regulations, 2026, directions issued by the Reserve Bank of India (“RBI”) applicable to Authorised Dealer Category-II entities, and other applicable regulatory requirements, including the Reserve Bank – Integrated Ombudsman Scheme, 2021 (as amended from time to time).

The Policy sets out the procedure for receiving, registering and disposing of the complaints and grievances of Customers (“Complaints”) in respect of the Company’s products and services, including Complaints relating to services provided by third-party agents, franchisees or business correspondents appointed by the Company to provide such services on its behalf. It applies to all customer queries and Complaints received through Email, Calls, WhatsApp/Chat, Social Media, Website and any other official customer communication channel, in line with the Company’s Standard Operating Procedure for Customer Support, and aims to educate Customers about the process to lodge a Complaint with the Company and/or the RBI.

2. Definition of Complaint

“**Complaint**” means any expression of dissatisfaction made by a Customer, whether oral or written, regarding any product, service, transaction, employee conduct, delay, charges, technology platform, partner service, or any act or omission of the Company or its authorised representatives.

3. Principles of Grievance Redressal

The Company’s grievance redressal framework is based on the following principles:

- **Fair treatment of customers** – Customers are treated fairly and without bias at all times.
- **Transparency** – processes, timelines and escalation avenues are clearly communicated.
- **Timely resolution** – Complaints are resolved within defined turnaround times.
- **Accountability** – responsibility for resolution is defined at every level.

- **Accessibility** – multiple channels are available to raise a Complaint.
- **Continuous improvement** – recurring issues are addressed through root cause analysis.

4. Purpose

The purpose of this Policy is to ensure that:

- Customers are treated fairly and without bias at all times.
- Complaints are handled with courtesy and consistency and resolved in a timely manner, within defined turnaround times (TAT).
- Customers are informed of the avenues available to escalate their Complaints within the Company.
- Customers are informed of their rights so that they may pursue alternative remedies if not fully satisfied with the Company's response or resolution.
- Accountability for Complaint resolution is clearly defined across every level of the organisation.

5. Scope and Complaint Categories

This Policy applies to all Complaints received from Customers across all business lines and channels — Email, Calls, WhatsApp/Chat (including platform in use), Social Media, Website, branch/walk-in, and any other official communication channel — and covers Complaints relating to products, services, and the conduct of the Company's employees, agents, franchisees or business correspondents.

For registration, tracking and reporting purposes, Complaints may include the following categories:

Outward Remittance	Inward Remittance	Forex Cards
Refunds	Transaction Delays	Exchange Rates
Charges	KYC	Mobile Application
Website	Branch Service	Employee Conduct
Fraud / Suspicious Transactions	Others	

6. Customer Responsibilities

To enable prompt and effective resolution, Customers are expected to:

- provide complete and accurate information relating to the Complaint;
- provide the supporting documents relevant to the Complaint;
- respond promptly to any request for clarification or additional information; and
- use the official communication channels of the Company set out in this Policy.

7. Process of Grievance Redressal

Customers who wish to file a Complaint may do so through any of the following channels, furnishing complete details of the Complaint:

- Contact Centre — Toll-free: 1800 267 3899 / Mobile: +91 8976707222;
- Email at customersupport@wsfxglobalpay.com;
- WhatsApp/Chat via the Company's official chat channel or website chat;
- Registration at any of the Company's branch offices, where applicable; or
- Branch-wise contact details available at <https://www.wsfxglobalpay.com/contact-us>.

7.1 Acknowledgement and Registration

The Company shall endeavour to acknowledge Complaints immediately upon receipt through the ticketing system. In any event, an acknowledgement shall be sent within three (3) working days from the date of receipt.

The acknowledgement shall include:

- the Complaint Registration Number;
- the date of registration of the Complaint;
- the expected turnaround time (TAT) for resolution; and
- the escalation details, including the designated officer handling the Complaint.

7.2 Internal Escalation Matrix (Primary Level)

On receipt, every Complaint is logged in the Company's ticketing system and handled through the following internal escalation matrix, as per the Company's Standard Operating Procedure for Customer Support:

Level	Owner	Responsibility	TAT
Level 1	Customer Support Team	Receives, acknowledges and attempts first-level resolution of the Complaint.	1–4 hours

Level	Owner	Responsibility	TAT
Level 2	Reporting Manager	Reviews and resolves Complaints that cannot be resolved at Level 1.	Within 4 hours
Level 3	Department Head (HOD)	Handles critical Complaints requiring departmental intervention or decision-making.	Within 8 hours
Level 4	Senior Management	Resolves business-critical or exceptional cases requiring senior management approval or intervention.	Within 12 hours

The internal turnaround times set out above are operational service standards and do not override the regulatory timelines prescribed by the RBI (see Section 8).

Escalation guidelines:

- All Customer Complaints are first handled by the Customer Support Team (Level 1).
- A Complaint is escalated to the next level only after all possible first-level troubleshooting has been completed, or the applicable TAT has lapsed.
- Every escalation must record the Ticket Number, Customer details, issue summary, actions already taken, and the reason for escalation.
- Any delay beyond the specified TAT at a given level must be immediately escalated to the next level.
- Repeated breaches of TAT are reviewed periodically to identify root causes and implement corrective action.

7.3 Officials / Touchpoints for Redressal of Complaints

If a Customer is not satisfied with the resolution provided at any level, the Complaint may be escalated to the next touchpoint as follows. To avoid amending this Policy whenever personnel change, the touchpoints below are identified by designation; the names and direct contact details of the current officeholders are maintained separately and published on the Company's website.

Level	Touchpoint (Designation)	Contact Details
Level 1	Contact Centre / Head – Customer Support	Toll-free: 1800 267 3899 Mobile: +91 8976707222 Email: customersupport@wsfxglobalpay.com

Level	Touchpoint (Designation)	Contact Details
		Website: https://www.wsfxglobalpay.com/contact-us
Level 2	Grievance Redressal Officer	Email: grievance.redressal@wsfxglobalpay.com
Level 3	Principal Nodal Officer	Email: nodal.officer@wsfxglobalpay.com

The Company has designated a Principal Nodal Officer responsible for the implementation of the Customer Grievance Redressal Mechanism and for liaison with the Reserve Bank of India in respect of customer grievances.

7.4 Complaint Closure

A Complaint shall ordinarily be closed only after:

- the Customer confirms acceptance of the resolution; or
- the Company has communicated its final response and no further response is received from the Customer within the prescribed period; or
- the Complaint is otherwise resolved in accordance with applicable law.

7.5 RBI Complaint Management System / Integrated Ombudsman

If the Customer is not satisfied with the resolution provided by the Principal Nodal Officer at Level 3, or the Complaint remains unresolved within the timelines specified in Section 8, the Customer may approach the Reserve Bank of India in any of the following ways:

- Online, through the RBI Complaint Management System (CMS) at <https://cms.rbi.org.in>;
- Online, through the RBI's Sachet portal at <https://sachet.rbi.org.in>; or
- by approaching the RBI Ombudsman under the **Reserve Bank – Integrated Ombudsman Scheme, 2021** (as amended from time to time).

As the Company's registered office is in Mumbai with branches across India, Customers are advised to use the RBI CMS / Sachet portals above, which automatically route the Complaint to the RBI Ombudsman office having jurisdiction over the Customer's location or the relevant branch, rather than writing to a specific regional office.

8. Redressal of Complaints — Regulatory Timelines

- Customers are advised to file the Complaint furnishing complete details to the Company.
- On receipt of a Complaint, the Company shall provide an acknowledgement along with a Complaint Registration Number and the details of the designated officer handling the Complaint, within three (3) working days from the date of receipt.
- The Company shall provide necessary clarification/justification and take all appropriate measures to resolve the Complaint within thirty (30) working days from the date of receipt, without prejudice to the internal TAT set out in Section 7.2.
- Where additional time is required, the Company shall inform the Customer of the requirement, along with the expected timeline for resolution.
- The Head of Customer Support / Operations shall ensure that all Complaints are resolved within the stipulated timeframes.
- A record of all Complaints and the Company's response/resolution shall be maintained as per the Company's document preservation and archival policy.

9. Root Cause Analysis and Continuous Improvement

The Company shall periodically analyse complaint trends to identify systemic issues, recurring causes and opportunities for process improvement, and shall implement appropriate corrective and preventive measures.

10. Complaints Involving Fraud or Financial Crime

Complaints involving suspected fraud, cyber incidents or financial crime shall be immediately escalated to the Principal Officer / Compliance function and handled in accordance with the Company's Fraud Risk Management Framework, in addition to being processed under this Policy.

11. Data Privacy and Confidentiality

Customer information received during grievance handling shall be treated as confidential and handled in accordance with applicable data protection laws and the Company's information security policies.

12. Policy Review

This Policy is subject to review by the Board of Directors as and when deemed necessary and, in any event, at least annually.

This Policy shall be subject to applicable law, including rules, regulations, guidelines, directives and instructions issued by the RBI from time to time, and shall supersede any earlier version. Any change or amendment in applicable law relating to the grievance redressal mechanism shall be deemed to be incorporated in this Policy by reference, and this Policy shall be deemed amended and revised accordingly.

13. Website Disclosure

This Policy shall be uploaded on the website of the Company at <https://www.wsfxglobalpay.com/contact-us>. In addition, the website shall display:

- Customer Care contacts;
- the Grievance Redressal Officer;
- the Principal Nodal Officer;
- the Escalation Matrix;
- the RBI CMS link; and
- the RBI – Integrated Ombudsman Scheme details.

14. General

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional requirements as may be prescribed under applicable laws/regulations, whether existing or arising out of any amendment thereto, from time to time.