



ANAND RATHI INTERNATIONAL VENTURE (IFSC) PRIVATE LIMITED

POLICY ON INVESTOR GRIEVANCE HANDLING MECHANISM

1. OBJECTIVE

The objective of the policy is to address the grievances of the customers. The company's philosophy is entirely client-centric, with a clear focus on providing long-term value addition to clients, while maintaining the highest standards of excellence, ethics, and professionalism. Thus, we ensure that customers are satisfied with the services rendered by us. This policy has been formulated in order to ensure that the grievances of the customers are effectively & timely redressed.

To frame the guidelines for investor grievance and its Redressal and reporting of such Grievances as mandated in the Circulars issued by SEBI and Stock Exchanges from time to time.

2. SCOPE OF THE POLICY:

This policy covers all the investor grievances received and their resolution, subject to the guidelines issued by the IFSCA / Stock Exchanges from time to time, in any segment of any exchange for which ANAND RATHI INTERNATIONAL VENTURE (IFSC) PRIVATE LIMITED (ARIVL) is a member.

3. GENERAL GUIDELINES ON HANDLING INVESTOR GRIEVANCES:

The company has a separately designated investor grievances email id ifscgrievance@rathi.com, which the client or investor can lodge a complaint. The designated email ID is displayed on the website of the Company and printed prominently on the Notice Boards displayed at the Head Office, Branch, and Authorized Person's office, printed on various KYC forms, contract notes, statements and other communications sent to Clients. The company has a Compliance Department at its corporate office with requisite staff strength headed by the Compliance Officer. All the complaints received on the aforesaid email ids are mapped and located at head office. Upon receipt of the complaint, it is escalated, send and share with the respective region for ascertaining 'the fact of the complaint' wherever required.

Investor Grievances escalation matrix is explicitly displayed on the index/homepage of website www.anandrathigiftcity.com under the 'Contact Us' section. Upon clicking the same, it displays the following details:

Escalation Matrix:

Details of	Contact Person	Direct Contact No.	Email Id	Operational/ Working Hours
Customer care	Nikeysha	0291 6661001	customersupport@rathi.com	9.30am to 6.30 pm
Head of Customer Care	Mohammed Waseem	0291 710 5596	mohdwaseem@rathi.com	9.30am to 6.30 pm
Compliance Officer	Deepak Kedia	022 62817191	deepakkedia@rathi.com	9.30am to 6.30 pm
Principal officer (PO)	Mr. Dinesh Modi	079-61340200	dineshkumarmodi@rathi.com	9.30am to 6.30 pm

RECEIPT OF COMPLAINT

ANAND RATHI INTERNATIONAL VENTURE (IFSC) PRIVATE LIMITED (ARIVL) can receive client complaints directly from clients and through any of the following modes:

1. Physical letters
2. An e-mail on the designated email id
3. Phone Call
4. Personal visit
5. Through SEBI SCORES Portal
6. Regulatory authorities
7. Advocates
8. Consumer forums, etc.

RECORDING OF COMPLAINT

A Register of Complaints is maintained in accordance with the rules, regulations, Bye laws and directives of the Exchanges/IFSCA stating complete details of complaints including the name of the originating branch, authorized person, etc. All the Investor's complaints are recorded immediately in the Investor Grievance Register maintained separately for each Exchange and Depository. The Complaint received either physically or electronically by email shall be filed serially.

HANDLING OF COMPLAINT

Compliance Department to ensure that the complaints received from investors are redressed earliest and without delay. All the Investor Grievances received are verified and scrutinized by the compliance department. On receipt of the complaint, the Compliance department can seek further information from the complainant and also seek any details/information from the concerned department/officials/Authorized Person for verification against allegations made in the complaint. If there is no response from the concerned department/officials/Authorized Person within 7 working days of the complaint, the same is escalated to Management. The company has set a target period of a maximum 30 days for redressal of any complainant and providing prompt reply to the Investor.

To further strengthen the process of handling Investors Grievances, following measures are taken:

- a) Multiple modes of communication should be made available to the clients, with a view to ensure a seamless process in raising the complaints.
- b) hiring qualified/dedicated trained resources, and impart adequate training for better handling and suitable closures.
- c) Escalation matrix should be defined and displayed on the website towards the complaint redressal mechanism/process.
- d) Acknowledgment should be sent to the investor, once the grievance is received /escalated/resolved and should state the Service ticket / Complaint reference number in it.

GRIEVANCE REDRESSAL MECHANISM

FOLLOWING ARE THE SCENARIOS THE CLIENT CAN USE FOR ESCALATION OF GRIEVANCES IF SATISFACTORY RESOLUTION IS NOT OBTAINED:

Level 1:-

- The client will first approach ARIVL at the designated Investor Grievance e-mail ID. ARIVL will acknowledge acceptance of complaints, in writing, but not later than 3 days after the receipt of the grievance.
- In case of non-acceptance, ARIVL shall inform the complainant within 5 working days along with reasons.

Level 2:-

- ARIVLs will assign a Complaint Redressal Officer” (CRO) who shall be an employee and shall examine and process the complaint in a fair, transparent, professional, and impartial manner.
- ARIVL shall dispose of the complaint preferably within 15 days but not later than 30 days of acceptance of the complaint.

Level 3:-

- If a complainant is not satisfied with the resolution provided by ARIVL, the complainant may file an appeal before the CRAO (Complaint Redressal Appellate Officer) of the Regulated Entity preferably within 21 days from the receipt of the decision from the CRO (Complaint Redressal Officer).
- The CRAO (Complaint Redressal Appellate Officer) shall dispose of the Appeal within 30 days.

Level 4:-

- Where a complainant is still not satisfied with the decision of the market infrastructure institution, the complainant may file a complaint before the Authority through email to grievance-redressal@ifsca.gov.in within 21 days from the receipt of the decision.

REVIEW OF COMPLAINT

The Compliance Department regularly monitors and reviews complaints according to its nature, originating branch, against a particular employee and/or authorized person etc. and on the basis of such analysis, inform the management to take adequate steps to strengthen the systems.

The Management reviews the status of pending complaints.

The Internal Auditors review grievances status on a periodic basis.

4. MAINTENANCE OF RECORDS

The Complaint Register & Records will be maintained for such period as prescribed by regulatory authority.

5. ACTION

Authority may take such action, as deemed fit, against a Regulated Entity for non-compliance with the requirements specified by the Authority.

This policy and procedure is a standard document and subject to change or amends from time to time as per change in the Rules & Regulations of IFSCA / Respective Exchanges / any other Government Authority or found necessary to change or amend due to Company needs. All the staff members shall comply with the Policy. ARIVL has reserved rights to implement amended policy and procedure without amending this documented policy.