

StockHolding Securities IFSC Limited

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COMPLAINT HANDLING & GRIEVANCE REDRESSAL POLICY

Issue/Approval date	Version No.	Document Reference
13/01/2025 (Circular Resolution date:10/01/2025)	3.0	SSIL/POLICY/IG POLICY

Version No.	Date	Details	Prepared by	Reviewed by	Approved by
3.0	13/01/2025		Mgt.	ARNB	Board
2.0	03/05/2023		Mgt.	ACB	Board
1.1	20/01/2023	Added word "IFSCA"	-	-	Board
1.0	18/06/2020		Mgt.	-	ACB

Policy Governance:

Frequency of review	Annual/as and when required
Last reviewed on	10.04.2024 (31 st BM)
Approval path	Management Committee → ACB → Board
Supersedes	Investor Grievance Policy V 2.0

INVESTOR GRIEVANCE POLICY

Version 3.0

(for Internal Use Only)

COMPLAINT HANDLING & GRIEVANCE REDRESSAL POLICY

1. Handling of all investor grievances for the Company's Broking and Clearing activities is a centralized function and is being handled by Compliance department at corporate office.
2. A designated e-mail id investor.grievances@stockholdingifsc.com has been created and the same has been displayed on our website www.stockholdingifsc.com under the heading "Complaint Handling and Grievance Redressal".
3. Definitions:
 - a) **"Policy"** means "Complaint Handling & Grievance Redressal Policy"
 - b) **"Complaint"** means Complaints arising out of activities that are covered under SEBI Act, 1992; Securities Contract Regulation Act,1956; Depositories Act,1996, Complaints arising out of activities that are covered under SEBI Act, 1992; Securities Contract Regulation Act,1956; Depositories Act,1996 The International Financial Services Centres Authority Act, 2019 and Rules and Regulations made there under and provisions that are covered under.

Matters not considered as 'complaint':

- Anonymous complaints (except whistleblower complaints)
 - Incomplete or un-specific complaints
 - Allegations without supporting documents
 - Suggestions or seeking guidance/explanation
 - Complaints on matters not relating to the financial products or services provided by the Company
 - Complaints about any unregistered/ un-regulated activity
 - References in the nature of seeking information or clarifications about financial products or services
- c) **"Complaint Redressal Appellate Officer"** or "CRAO" means a senior level person designated for handling appeals of consumers against the decision taken by the Complaint Redressal Officer.
 - d) **"Complaint Redressal Officer"** or "CRO" shall be an employee of the Company responsible for handling of complaints received from its consumers.
 - e) **"Consumers"** means Client" or "Customer" as defined in FSCA (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines,

2022.

(A). COMPLAINT HANDLING PROCEDURE

1. On receipt of complaint at the investor.grievances@stockholdingifsc.com or at the office (hard copy or soft copy), the CRO will make an assessment on the merits of the complaint, pursuant to assessment the Company shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
2. In case of non- acceptance, the Company shall inform the complainant within 5 working days along with reasons. The Company shall ensure that the CRO has sufficient authority to examine and resolve the complaint and if necessary, may ask for additional information.
3. Any course of action which involves the concerned department at Head office it would be informed to the concerned head of the department and Business team.
4. If there is no response from concerned department within 3 working days of the complaint, the same would be escalated to Head Compliance for immediate action and if there no response within 5 working days the same would be reported to the Designated Director as in the form of an MIS reporting.
5. The CRO has authority to resolve the complaint and has access to other officials with the necessary authority to be able to handle the complaint in a fair and impartial manner:

Provided that, where the CRO is or was involved in the conduct of the financial transaction which is the subject matter of the complaint, the complaint shall be handled by another officer designated by the MD & CEO, in a fair and impartial manner.

6. All complaints should be resolved within time period of 15-30 days of the receipt of the complaint to the department.
7. In case more than 3 complaints received during a month (number of complaints is subject to review depending upon the market conditions and volumes generated) the compliance department would keep the Business Head/ designated director informed/ updated.
8. The office would maintain an investor grievance register as in the format specified as Annexure1, this register would be subject to audit and inspection by the compliance officer of the company.
9. All the investor grievances would be handled in the following manner by the compliance department.

- a) All the investor grievances (hard copy or softcopy) would be updated in an excel

register (softcopy) as in the format specified in Annexure 2 on the same day of the receipt of the complaint. This register would be monitored by the compliance officer.

- b) After verification and scrutiny, the appropriate steps would be initiated to resolve the complaint at the earliest.
- c) As per the exchange/depositary/IFSCA/SEBI directives the complaint register has to be maintained in hardcopy function wise i.e. Broking complaint register, Clearing complaint register in the format specified in Annexure 3.
- d) Therefore, compliance department will ensure that depending upon the type of the complaint, all the information i.e. from the receipt of the complaint till the status of being resolved would be updated in the register.

(B). APPEAL MECHANISM

- 10. If a complainant is not satisfied with the resolution provided by CRO or if the complaint has been rejected by the Company the complainant may file an appeal before the CRAO of the Company preferably within 21 days from the receipt of the decision from the CRO.
- 11. The CRAO shall dispose of the Appeal within a period of 30 days.
- 12. The compliance officer would ensure that it gives its sign-off only after the complaint is resolved. Also, the compliance officer would ensure that handling and disposal of complaints by the Company are in accordance with the regulatory requirements specified by IFSCA.

(C). MAINTENANCE OF RECORDS

The company shall maintain all records relating to handling of complaints including:

- i. Complaints received and processed;
- ii. All correspondence exchanged between the Company and the complainants;
- iii. All information and documents examined and relied upon by the Company while processing of the complaints;
- iv. Outcome of the complaints;
- v. Reasons for rejection of complaints, if any

(D). REPORTING

- i. In case of any Complaint(s) received: A monthly MIS of the complaints received, pending and or resolved would be given to the Board of Directors of the Company.
- ii. In case of nil complaints: a quarterly NIL report would be given to Head of Business/

designated Director of the Company.

Annexure 1

Format of the investor grievance register which has to be maintained at the branches and associates offices

Sr. No.	Date of complaint received	Whether received in hardcopy or through courier	If complaint received through courier details of the courier	Name of the client	Client code/ Demat account number	Brief Particulars of the complaint	Date of complaint sent to HO	Steps taken to resolve the complaint, after the same being received from HO- Compliance department	Date of complaint being resolved and Sign off the branch manager/sub-broker/remisier/ authorized person

Annexure 2

Sr. No.	Division	Location	Date of complaint recd.	Name of the sender	Client Code	Address of the complainant as per master database	e-mail id of the sender	Date of e-mail received	Subject	Action taken	Status (whether resolved/ pending)	Last e-mail dtd. for resolved status

Annexure 3

Sr. No.	Client Code	Name of the Client	Address of the Client	Complaint Against	Brief Particular	Date of receipt of complaint	Mode of Receipt	Date of Resolving	Remarks