



FINAAX CAPITAL ADVISORS PRIVATE LIMITED
INVESTOR GRIEVENCE REDRESSAL POLICY
EFFECTIVE FROM DECEMBER 05, 2024

1. Introduction

This Policy for Investor Grievance Redressal is duly approved by the Board of Directors of Finaax Capital Advisors Private Limited. At Finaax, we believe in quick and effective handling of grievances with promptness and correct course of actions and processes as an integral part of our services. This policy document is to enable us to effectively manage grievances from investors with specific emphasis on resolving such complaints fairly and expeditiously.

Objective of this policy document is to ensure that:

- a) Courteous and on time resolution of grievances.
- b) Fair and equitable handling and resolution of grievance.

2. Definitions

- a) Investor: shall mean an individual, entity, body corporate or such other person who shall be an investor in securities or would be investing in securities of an entity related to any of the transactions undertaken by Finaax Capital Advisors Private Limited in its capacity as a Merchant Banker.
- b) Complaint or Grievance: is an expression of dissatisfaction made by the Investor related to the services of the Company in its capacity as a Merchant Banker and/ or its Client including in respect of any disclosure/ process/ information in any of the transaction undertaken by Finaax Capital Advisors Private Limited in its capacity as a Merchant Banker. For the purpose of this Policy, it is to be noted that a general opinion on services is not to be considered as a grievance.
- c) Client / Customer: shall mean client/ customer of the Company.
- d) Redressal: can be defined as a process or action resulting in giving a solution or response to the problem faced or concern raised by an Investor.

3. Guiding Principles

- a) Transparency: The Investor to be provided with all the necessary information sought in connection with the aspect concerning which grievance has been raised and the channels to convey and resolve their issues. In addition, if the resolution is expected to take longer time, same should be communicated to the Investor. For this purpose, information which has been classified as 'Confidential Information' will not form a part of this requirement.
- b) Accessibility: The Company will provide multiple mediums and access points through which the Investor shall be able to communicate their complaints or grievances and avail redressal services.
- c) Escalation: In the event an investor is dissatisfied with the resolution provided by the primary handler of grievance, the process of escalation of complaints to higher level to be provided by the primary handler.

4. Resolution Process

The process of Investor grievance resolution has been laid down in **Annexure-A** to this policy. The Compliance Officer shall be designated as Grievance Redressal Officer under this Policy.

Appropriate resolution or response shall be provided as soon as possible depending upon the nature of the complaint or concern. Notwithstanding anything to the contrary contained herein, the Company shall comply with the grievance redressal mechanism and process as prescribed under SEBI Circular dated September 20, 2023 on the redressal of investor grievances through the SEBI Complaints Redressal (SCORES) Platform and linking it to Online Dispute Resolution platform ("SEBI Grievance Redressal circular").

The Company shall adhere to the norms, process, procedure, checklist and registers as may be specified by SEBI from time to time, including compliance of SEBI Circular SEBI/HO/DDHS/P/CIR/2021/613 dated April 13, 2022 in connection with the Publishing Investor Charter and Disclosure of Complaints by Merchant Bankers on their Website.

5. Changes to Policy

The Company shall reserve the rights to review and make amendment to the Policy from time to time as it deems fit in accordance with the applicable laws, rules and regulations for the time being in force. In the event of any conflict between the provisions of this Policy and the Act or Regulations or Rules or any other statutory enactments, the provisions of such Act or Regulations or Rules or statutory enactments shall prevail over this Policy. An interim review and amendment can also be carried out to accommodate minor changes, if any, on regulatory and operating front by the Compliance Officer of the Company.

Annexure-A

Resolution Process

- a) Complaints can be lodged by email or in writing to the Grievance Redressal Officer, whose details are mentioned below:

Grievance Redressal Officer: Ms. Vrunda Patel

Email: investors@finaaxcapital.com

Address: 618, East Wing, Venus Stratum, Near Jhansi Ki Rani, Nehrunagar, Ahmedabad, Gujarat, India – 380015

- b) If the Investor is not satisfied by the resolution/response provided or has not received any resolution/ response from the Grievance Redressal Officer within 10 calendar days after filing the in compliant/ required information, the investor may escalate the matter to Director, whose details are mentioned below:

Director: Mr. Ikshit Shah / Mr. Yash Doshi

Email: ikshit@finaaxcapital.com / yash@finaaxcapital.com

Address: 618, East Wing, Venus Stratum, Near Jhansi Ki Rani, Nehrunagar, Ahmedabad, Gujarat, India – 380015

In all cases, Finaax Capital Advisors Private Limited shall endeavor to resolve or respond to the complaint with the requisite information within 21 calendar days from the date of complaint.

- c) In case the Company has rejected the Complaint or the Complainant has not received any communication from the concerned Company or is not satisfied with the reply received or the redressal by the Company, the Investor may file their complaint in SCORES 2.0 portal of SEBI. The Investor may lodge the Complaint against the Company on SCORES 2.0 Portal within a period of one year from the date of occurrence of the cause of action i.e., rejection of complaint or non-receipt of any communication or reply / redressal received being not satisfactory.
- d) The Investor needs to register on the SEBI SCORES 2.0 portal at <https://scores.sebi.gov.in/scores-home> by clicking on "Sign Up" and selecting the category as "Investor". Details like Name of the Investor, Permanent Account Number (PAN), contact details, email-id, etc. are required at the time of registration on the Scores 2.0 Portal.
- e) Upon successful registration, a unique user id and a password shall be generated and communicated through an acknowledgement email to the Investor. The Investor may then proceed to submit a complaint or grievance directly to Finaax Capital Market Limited under the 'Merchant Bankers' category.
- f) The Company shall resolve the complaint and upload the Action Taken Report ("ATR") on SCORES 2.0 within the timeline prescribed as per the SEBI Grievance Redressal circular. The ATR uploaded by the Company will be automatically routed to the complainant.
- g) In case, the Investor is not satisfied with the resolution provided, the Investor may request for a review of the resolution provided by the entity within 15 calendar days from the date of the ATR by the Company. In case of review, the Association of Investment Bankers of India ("AIBI" or "the Designated Body"), being the Designated Body specified by SEBI, shall take cognizance of the complaint through SCORES 2.0 and seek clarifications from the Company. The Designated Body shall submit the revised ATR to the Investor on SCORES 2.0 within the timeline prescribed as per the SEBI Grievance Redressal circular.

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- h) In case the Investor is not satisfied with the resolution provided after the review process stated in point (g) above, the Investor may request for a second review of the resolution provided within 15 calendar days from the date of the revised ATR by the Designated Body. In case of second review, SEBI may take cognizance of the complaint through SCORES 2.0 and seek clarifications from the Company and/or the Designated Body. The Company shall provide clarification to the respective Designated Body and/or SEBI, wherever sought and within such timeline as specified. The second review Complaint shall be treated as 'resolved' or 'disposed' or 'closed' only when SEBI 'disposes' or 'closes' the Complaint in SCORES 2.0.
- i) After exhausting the options for resolution of the grievance as mentioned in the paragraphs above, if the Investor is not satisfied with disposal of complaint on SCORES 2.0 portal post SEBI review or in cases where the issues raised require adjudication on any third party rights, on questions of law or fact or which is in the nature of a dispute between the parties, the Investor shall seek appropriate remedies through the Online Dispute Resolution mechanism in securities market. In addition, the Investor has the option to approach legal forums including civil courts, consumer courts etc.
- j) In case the Investor opts for Online Dispute Resolution mechanism or other appropriate civil remedies at any point of time while the complaint is pending on SCORES 2.0, the pending Complaint shall be treated as disposed on SCORES 2.0 portal.
- k) The Investor may also contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on the SCORES 2.0 platform. The list of IAs is available at www.sebi.gov.in.

Important links:

SEBI SCORES 2.0: <https://scores.sebi.gov.in/scores-home>

SMART ODR: <https://smartodr.in/login>