

INVESTOR GRIEVANCE REDRESSAL POLICY

INDIUM INVESTMENT ADVISERS PVT. LTD

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INTRODUCTION/ BACKGROUND

Indium Investment Advisers Pvt. Ltd. (hereinafter referred to as "**Indium**") is a SEBI Registered Investment Adviser bearing SEBI Registration No. INA000020660, having its office at 801, Chandak Chambers, Sir Mathuradas Vasanji Road, Chakala, Andheri East, Mumbai - 400099, Maharashtra.

With the objective of expanding its services to include Portfolio Management Services (PMS) in accordance with the applicable regulations prescribed by the Securities and Exchange Board of India (SEBI), the Company has applied to SEBI for registration as a Portfolio Manager. The application for registration as a Portfolio Manager is presently under process.

OBJECTIVE

The objective of this Policy is to provide an efficient and effective grievance redressal mechanism for investors. This Policy has been formulated taking into account the following principles:

- Investors are always treated fairly.
- All complaints are dealt with efficiently and in a timely manner.
- Confidentiality is always maintained.
- Investors are informed of avenues to escalate their complaints/grievances.
- Employees work in good faith and without prejudice, towards the interests of the Investors

DEFINITIONS

- **Complaint**: A complaint refers to any written or verbal expression of dissatisfaction by an investor regarding the services, actions, or inactions of the firm that affect their rights, interests, or financial transactions. Complaints may relate to issues such as deficiency in service, incorrect or misleading information, non-receipt of funds/securities, unauthorized transactions, or non-compliance with regulatory obligations.
- **Query**: A query refers to any request for information, clarification, or assistance raised by an investor regarding products, services, transactions, or general operational aspects. It does not indicate dissatisfaction but rather seeks guidance or explanation.

GENERAL PROVISIONS FOR INVESTOR COMPLAINT/ GRIEVANCES REDRESSAL

Investors (hereinafter referred as "Investor" or "Client" or "Complainant") with grievance or complaints regarding services provided by Portfolio Manager may submit their concerns through the following channels:

1. **Offline Mode:**

    - For prompt resolution and efficient handling of investor complaints, Portfolio Manager can contact Compliance Officer. The Compliance Officer ensures that all grievances are addressed in a timely and effective manner, prioritizing investor satisfaction and compliance with regulatory requirements. Investors can submit their concerns or complaints by reaching out to Portfolio Manager at its registered office address as provided below:

      Compliance Officer

      Name:-Suresh Wari

      Address:-801, Chandak Chambers, Sir Mathuradas Vasanji Road, Chakala, Andheri East, Mumbai - 400099, Maharashtra.

2. **Electronic Mode:**

- **Email:**
    - Portfolio Manager has designated dedicated email IDs for investor grievance redressal. Investors can send concerns/complaints to Compliance@indiuminv.in
- **SCORES 2.0 (SEBI Complaints Redress System):**
    - Investors can lodge complaints on SEBI's SCORES portal within one year from the date of the cause of action at [https://scores.sebi.gov.in/]
- **Online Dispute Resolution (ODR) Portal:**
    - If an investor remains unsatisfied after utilizing the above-mentioned complaint procedures, they may escalate their complaint through the SMART ODR platform at: [https://smartodr.in/login]

DISPLAY OF GRIEVANCE REDRESSAL INFORMATION AT PORTFOLIO MANAGER OFFICES

Portfolio Manager is committed to maintaining transparency and ensuring the prompt resolution of investor complaints. To facilitate easy access to grievance redressal mechanisms, Portfolio Manager shall prominently display the contact details of its Compliance Officer and CEO of the business at its office, on its website. This information will include their names, contact numbers, and dedicated email IDs specifically assigned for handling investor complaints.

Additionally, Portfolio Manager shall provide the dedicated email IDs and contact details of SEBI at its offices. This will enable investors to directly reach out to the Regulator for lodging concerns or complaints. This initiative aims to provide investors with a

transparent, efficient, and structured communication channel for addressing their grievances and ensuring a seamless redressal process.

FRAMEWORK FOR HANDLING OF INVESTOR GRIEVANCE RECEIVED THROUGH SCORES 2.0

Investors have the option to lodge complaints through the SEBI Complaints Redress System (SCORES) by registering at https://scores.sebi.gov.in/. Registration requires the investor's name, PAN, contact details, and email address. Upon successful registration, a unique user ID and password will be sent to the registered email address.

Complaints must be submitted within one year from the date of the grievance, subject to the following conditions:

- The investor has previously contacted Portfolio Manager regarding the grievance and has either received no response or an unsatisfactory resolution.
- Portfolio Manager has formally rejected the complaint.

Complaints pertaining to market intelligence, such as alleged regulatory violations, should be submitted through the dedicated platform at https://mi.sebi.gov.in/.

Investors who are dissatisfied with the Action Taken Report (ATR) may request a review by providing clear and specific reasons for their dissatisfaction.

RESOLUTION PROCESS

A. Complaint Submission and Initial Handling:

- Upon receipt of a complaint ("Complaint") through SCORES, Portfolio Manager will endeavor to resolve the matter within 21 calendar days and submit an Action Taken Report ("ATR") detailing the resolution. The ATR will be accessible to the complainant via SCORES.
- SCORES will transmit the Complaint to the relevant Designated Body (as stipulated by Regulator), which will monitor Portfolio Manager's timely submission of the ATR.

B. First Review Process:

- If the complainant accepts the resolution outlined in the ATR or fails to request a review within 15 calendar days of the ATR date, the Complaint will be deemed resolved and closed on SCORES.
- If the complainant expresses dissatisfaction and requests a review within 15 calendar days, or if Portfolio Manager fails to submit the ATR within the stipulated 21-day period, the Designated Body will initiate a review through SCORES. The Designated Body may request further information or clarification from Portfolio Manager.
- Portfolio Manager will provide the requested information within the timeframe specified by the Designated Body. The Designated Body will then provide a revised

ATR to the complainant via SCORES within 10 calendar days of the review request.

C. Second Review Process:

- If the complainant remains dissatisfied after the Designated Body's review, they may request a second review by SEBI within 15 calendar days of receiving the Designated Body's ATR. If no such request is made within this timeframe, the Complaint will be deemed resolved and closed on SCORES.
- If the complainant requests a second review, or if the Designated Body fails to submit its ATR within 10 calendar days, SEBI may conduct a second review through SCORES.
- SEBI may engage with relevant stakeholders, including Portfolio Manager and/or the Designated Body, during its review. Portfolio Manager will promptly address any concerns raised by SEBI and submit a revised ATR through SCORES within the timeline specified by SEBI.
- SEBI or the Designated Body (as applicable) may request further clarification from Portfolio Manager. Portfolio Manager will respond within the specified timeframe. A second review Complaint will only be considered "resolved," "disposed," or "closed" upon SEBI's official closure of the Complaint on SCORES. The submission of an ATR in response to a SEBI review does not, in itself, constitute closure of the Complaint.

ONLINE DISPUTE RESOLUTION AND OTHER MECHNISM

In cases where investors raise issues, which require adjudication on any third party rights, on questions of law or fact or which is in the nature of a lis between parties, or if investors are not satisfied with disposal on SCORES post SEBI review, they shall seek appropriate remedies through the Online Dispute Resolution mechanism in securities market. In addition, investors have the option to approach legal forums including civil courts, consumer courts etc.

Investor can approach the Online Dispute Resolution mechanism or other appropriate civil remedies at any point of time. In case the complainant opts for Online Dispute Resolution mechanism or other appropriate civil remedies while the complaint is pending on SCORES, the complaint shall be treated as disposed on SCORES.

INVESTOR CHARTER AND COMPLAINT DISCLOSURE

Portfolio Manager, in compliance with SEBI guidelines issued from time to time shall publish an Investor Charter on its website to ensure transparency and investor awareness. This Investor Charter will outline Portfolio Manager's vision, mission, services offered, and grievance redressal mechanisms for addressing investor complaints. To facilitate easy access, the Investor Charter shall be:

- Uploaded on Portfolio Manager's website with a direct link on the homepage.
- Displayed prominently at its office premises.
- Provided to clients as part of the account opening kit.
- Shared through emails or letters with investors.

Additionally, Portfolio Manager shall disclose details of investor complaints received and their resolution status on its website by the 7th of each month, as per the SEBI-prescribed format.

REVIEW

The policy will be reviewed and updated as required to incorporate any changes introduced by regulatory authorities. Additionally, it will undergo periodic reviews to ensure its continued relevance, effectiveness, and alignment with current regulatory requirements and industry standards.

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