

Geojit IFSC Limited

GRIEVANCE REDRESSAL POLICY

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Part I: Background

Geojit IFSC Limited is a registered Broker dealer and distributor with International Financial Services Centers Authority (IFSCA) vide ref. no. *IFSC/BD/2022-23/0008* and *IFSCA/CMI/Distributor/2023-24/0004* respectively and for carrying on such other activities as are permitted by recognized stock exchange(s) and IFSCA. **This policy applies to all entities regulated by IFSCA dealing with any Customer other than their Group Entities, effective from 1st April 2025.**

Part II: Preamble and Objectives

The Objective of the Grievance Redressal Policy (the “Policy”) is to provide efficient services to the client and to effectively address and redress the grievances of the client in a timely manner. It also helps build confidence by formulating client grievance redressal mechanisms and developing friendly relations with the client.

The Broker or Distributor shall address all the complaints brought to its attention by the clients and also classify & differentiate queries, requests, and complaints, etc. and accordingly resolve them to the satisfaction of the clients concerned. The word Complaint could be defined as below –

A complaint is “Written expression of dissatisfaction from a client to an Authorized Person in connection with the provision of, or failure to provide, a Regulated Activity to the client”.

The Compliance Officer (Complaint Redressal Officer - CRO) is responsible for ensuring the provision of prompt and effective services to the clients and monitoring the dedicated email address of the Broker dealer or Distributor for Grievance.

Part III: General Principle

1. Clients are treated fairly at all times.
2. Grievances / Complaints raised by clients are dealt with courtesy and in a timely manner.
3. Queries and Grievances / Complaints are treated efficiently and fairly.
4. The Broker works in good faith and towards the interests of complaints.

Part IV: Key Steps for Redressal of Complaints

1. Complaint filing methods

For Broker Dealer:

- a. Email Address: grievance@geojitifsc.com
- b. Telephone: +91 9995809847
- c. Directly to a compliance Officer or CRO: Sojimon James Thomas
Email- sojimon@geojit.com

For Distribution:

- a. Email Address: grievance@geojitifsc.com
- b. Telephone: +91 79 68350008
- c. Directly to a compliance Officer or CRO: Devyanti Rana
Email- devyanti_r@geojit.com

2. Receipt of Complaints:

- a. The Compliance Officer or CRO checks the client grievances on a daily basis to check whether any new grievances/complaints have been lodged.
- b. On receipt of a complaint, the Company must record the complaint in the Register of Complaints.
- c. If a complaint is accepted, an acknowledgement reply to the complainant should be sent within 3 working days of receipt of complaint.
- d. If the complaint is nonacceptable as per the applicable conditions, it shall be informed to the complainant within 5 working days along with reasons.

3. Investigation of Complaints:

- a. The Company must ensure that any individual handling the complaint is not or was not involved in the conduct of financial services about which the complaint has been made and is able to handle the complaint in a fair and impartial manner.
Normally, the Compliance Officer will be responsible for investigating any complaints and will be authorised to assign tasks involved in the investigation process to any person or employee as deemed appropriate in that situation.
- b. Complaints posing high risk to the Company and depending upon severity of the matter involved, the Director should bring the matter to the attention of the board.
- c. The Compliance Officer and team gathers all information available on the Grievance / Complaint which is considered necessary for a proper investigation.

- a. The Compliance Officer must report high-risk complaints to the Board/ Audit committee for review.

4. Resolution of Complaints:

- a. The Company aims to resolve all complaints preferably within 15 working days but not more than 30 working days of acceptance of complaints. If the resolution takes longer the Company must provide an update in writing to the complainant.
- b. The Company may either resolve the complaint or reject the complaint. In case of rejections, the Company shall give reasons for rejection of the complaint, in writing.

Upon conclusion of an investigation of a complaint, the Company must promptly:

- i. Advise the complainant in writing of the resolution of the complaints;
- ii. Provide the complainant with clear terms of redress, if applicable; and
- iii. Comply with the terms of redress is accepted by the complainant.
- c. If the complaint is not satisfied with the terms of redress offered by the Company, the Company must inform the complainant of the other avenues, if any, for resolution of the complaint and provide him with the appropriate contact details upon request.
- d. The Compliance Officer must record the resolution in the Register of Complaints and, if applicable, the steps the Company has taken to remedy a recurring or systemic problem revealed by the complaint.

1. Record Keeping:

- a. This Register of Complaints will contain the name of the complainant, the substance of the complaint, a recorded of the Company's response, and any other relevant correspondence or records, and the action taken by the Company to resolve each complaint.
- b. The Company must maintain a record of all complaints made against it for a minimum period of six years from the date of receipt of a complaint.

Part V: Escalation Process

1. If the complainant is dissatisfied with the complaint review by the Compliance Officer, he/she can write to CEO or CRAO (Complaint Redressal Appellate Officer):

Mr. Chintan Arvindbhai Shah
Email: chintan_as@geojit.com
Tel; +9 1 7968350005

2. The CRAO shall dispose of the Appeal within a period of 30 working days.
3. If the complainant is not satisfied with the decision of the CEO/CRAO, the complainant may file a complaint before the Stock Exchange(s) through email to investorgrievance@nseix.com / inx.regulatory@inxindia.com.
4. In case of complaint against Trading Member /Clearing Member /Depository Participant, the complainant shall first approach the relevant market infrastructure institution for redress of the complaint within the said timeline.
5. If the complainant is still not satisfied with the decision of the market infrastructure institution, the complainant may file a complaint before the IFSCA through email to grievance-redressal@ifsc.gov.in preferably within 21 working days from the receipt of the decision.
6. If not satisfied with responses from both CRO and CRAO, Customers can escalate grievances to IFSCA within one year from the date of cause of action.

Part VI: Reporting and Transparency

Geojit IFSC Limited will disclose data on complaint received, resolve, rejected, and pending on its website under the section “Complaint Handling and Grievance Redressal”.

Complaint data will also be included in the company’s annual report, if applicable.

Part VII: Review of Policy

Amendments/Updates, Review and Control

The Compliance Officer will review this Policy on an annual basis or earlier, if required, in light of changes in regulatory compliance and business reasons.