

**POLICY FOR REDRESSAL MECHANISM OF INVESTOR
GRIEVANCE
OF
GEPL CAPITAL PRIVATE LIMITED**

POLICY FOR REDRESSAL MECHANISM OF INVESTOR GRIEVANCE

(Ref: SEBI/HO/MIRSD/DOS3/P/CIR/dated June 3, 2022)

We at GEPL CAPITAL Private Limited endeavor to address all complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable time and manner. We realize that quick and effective handling and resolution of client's/ Investor's grievance is essential to provide excellent client service.

To achieve this, our company has clearly documented policy for redressal of investor grievances. Through this policy, our company shall ensure that a suitable mechanism exists for receiving and addressing complaints from our clients/investors with specific emphasis on resolving such grievances fairly and expeditiously.

This policy seeks to ensure that;

- Grievance, if any that may arise shall be resolved in a proper and time bound manner with detailed advice to the client/investor. In case the resolution needs time, an interim response acknowledging the grievance/complaint shall be issued.
- The Compliance Officer shall give monthly report of the client's grievance to the Directors of the company with complete details as Name and Account number of the client, Nature of Complaint, Date of receipt of the complaint and status of resolving the same. For grievances remaining unresolved for a period of more than 15 days from the date of receipt, the Compliance officer shall provide a justification to the Directors.
- The Compliance officer shall maintain proper records of all grievances received and resolved.
- All personnel/employees at the customer facing channels and other support departments will be periodically trained in handling of client's complaints.
- The Grievance Redress Mechanism with updated contact details and email ID shall be

provided to the Clients and uploaded on the Company's website.

- Grievance Redress and Dispute Handling Mechanism For timely and proper redressal of clients / investors grievances and complaints, we have the following Grievance Redress and Dispute handling Mechanism in place:-

In case of any grievance/complaint against the GEPL CAPITAL Private Limited:

- The Client/Investor can contact Compliance Officer of the GEPL CAPITAL Private Limited:

Name	Email ID	SB/DP	Phone No.
Subhash Sharma	subhash@geplcapital.com complianceofficer@geplcapital.com	Stock Broker	022-66182400
Nickey Desai	complianceofficer@geplcapital.com	Depository	022-66182400

- You may also approach Director of GEPL CAPITAL Private Limited:

Name	Email ID	Phone No.
Vivek I. Gupta	vivek@geplcapital.com or Director@geplcapital.com	022-66182471

- If not satisfied with the response of the Stock Broker/Depository Participant, you may contact the concerned Stock Exchanges / Depository at the following:-

In absence of response/complaint not addressed to your satisfaction, you may lodge a complaint with

- CDSL at <https://www.cdslindia.com/Footer/grievances.aspx> -(in case of DP transaction)

2. BSE at <https://bsecregs.bseindia.com/ecomplaint/frmlInvestorHome.aspx> -(in case of BSE transaction)
3. NSE at <https://investorhelpline.nseindia.com/NICEPLUS/> - (in case of NSE transaction)

OR

4. SEBI at <https://scores.gov.in/scores/Welcome.html>
- The Client/Investor can also lodge grievances with SEBI at <http://scores.gov.in>. For any queries, feedback, or assistance, please contact SEBI Office on Toll Free Helpline at 1800 22 7575 / 1800 266 7575.
 - In order to further strengthen the Investor Grievance Redressal Mechanism, based on feedback received from market participants and the Working Group constituted for the purpose, following are issued as clarification to Circular No. CIR/MRD/DSA/24/2010 dated August 11, 2010, Circular No. CIR/MRD/DSA/2/2011 dated February 09, 2011, and Circular No. CIR/MRD/ICC/30/2013 dated September 26, 2013
 - **Resolution of complaints by Stock Exchange**

i. Timeline:

Stock Exchange shall ensure that the investor complaints shall be resolved within 15 working days from the date of receipt of the complaint. Additional information, if any, required from the complainant, shall be sought within 7 working days from the date of receipt of the complaint. The period of 15 working days shall be counted from the date of receipt of additional information sought. Stock Exchange shall maintain a record of all the complaints addressed/redressed within 15 working days from the date of receipt of the complaint/additional information. If complaint is not resolved within stipulated time frame, then the reason for non redressal in given time frame shall also be recorded.

ii. Service related complaints:

Stock Exchange shall resolve-service related complaints at its end. However, in case the complainant is not satisfied with the resolution, the same may be referred to the Investor Grievance Redressal Committee (“IGRC”), after recording the reasons in

writing by the Chief Regulatory Officer of the Stock Exchange or any other officer of the Stock Exchange Page 2 of 3 authorized in this behalf by the Managing Director. Service related complaints shall include non-receipt/ delay of Account statement, non-receipt/ delay of bills, closure of account/ branch, technological issues, shifting/closure of branch without intimation, improper service by staff, freezing of account, alleged debit in trading account, contact person not available in Trading member's office, Demat account transferred without permission etc.

iii. Complaints to be referred to IGRC:

For Complaints related to trade, settlement and 'deficiency in services', resulting into any financial loss, the stock exchange shall resolve the complaint on its own as per the time lines prescribed. However, if complaint is not resolved amicably, the same shall be referred to the IGRC, after recording the reasons in writing by the Chief Regulatory Officer of the Stock Exchange or any other officer of the Stock Exchange authorized in this behalf by the Managing Director. It shall be the responsibility of the Stock Exchange to provide documents/ necessary information after collecting the same from the member and/ or the complainant and provide necessary assistance to IGRC to ensure resolution of complaints in a timely manner.

Handling of complaints by IGRC:

- i. IGRC shall have a time of 15 working days to amicably resolve the investor complaint through the conciliation process. If IGRC needs additional information, then IGRC may request the Stock Exchange to provide the same before the initiation of the conciliation process. In such case, where additional information is sought, the timeline for resolution of the complaint by IGRC shall not exceed 30 working days.
- ii. IGRC shall not dispose of the complaint citing "Lack of Information and complexity of the case". The IGRC shall give its recommendation to Stock Exchange.
- iii. IGRC shall decide claim value admissible to the complainant, upon conclusion of the proceedings of IGRC. In case the claim is admissible to the complainant, Stock

Exchanges shall block the admissible claim value from the deposit of the member as specified in this regard.

- iv. Expenses of IGRC shall be borne by the respective Stock Exchange and no fees shall be charged to the complainant/member.
- v. The Stock Exchange shall organize a regular training program for IGRC members in consultation with the National Institute of Securities Markets (“NISM”). The cost of such program shall be borne by the Investor Service Fund (“ISF”) of the Stock Exchange.

Arbitration:

- a. For any dispute between the member and the client relating to or arising out of the transactions in Stock Exchange, which is of civil nature, the complainant/ member shall first refer the complaint to the IGRC and/ or to arbitration mechanism provided by the Stock Exchange before resorting to other remedies available under any other law. For the removal of doubts, it is clarified that the sole arbitrator or the panel of arbitrators, as the case may be, appointed under the Stock Exchange arbitration mechanism may consider any claim relating to any dispute between a stock broker and client arising out of the transactions in stock exchange, as per law, and shall always be deemed to have the competence to rule on its jurisdiction. A complainant/member, who is not satisfied with the recommendation of the IGRC shall avail the arbitration mechanism of the Stock Exchange for settlement of complaints within three months from the date of IGRC recommendation”.
- b. The time period of three months for filing arbitration shall be applicable only for the cases where the IGRC recommendation is being challenged. For any arbitration application received without going through IGRC mechanism, the above time period of three months shall not apply, and for such cases the limitation period for filing arbitration shall be governed by the law of limitation, i.e., The Limitation Act, 1963.

Amendment of SEBI Circular No. SEBI/HO/MRD1/ICC1/CIR/P/2022/94 dated July 04, 2022

Online Web Based Complaints Redressal System:

1. SEBI has implemented an online platform (SCORES) designed to help investors to lodge their complaints, pertaining to securities market, against listed companies and SEBI registered intermediaries.
2. In line with the same, to enable investors to lodge and follow up their complaints and track the status of redressal of such complaints from anywhere, GEPL has implemented an online web based complaints redressal system, which will facilitate investors to file complaints and escalate complaints for redressal through Grievance Redressal Committee (GRC), arbitration, appellate arbitration etc. in accordance with their respective byelaws, rules and regulations.

The salient features of the system shall be;

- The system should be web enabled and provide online access 24 x 7.
 - Complaints/GRC/Arbitration/Appellate Arbitration and reminders thereon are lodged online at anytime from anywhere;
 - An email is generated instantaneously acknowledging the receipt of the complaint and allotting a unique registration number for future reference and tracking;
3. The system is intended to expedite redressal / disposal of investors' complaints as it would also obviate the need for physical movement of complaints. Further, the

Amendment of SEBI Circular No. SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023

- Investors can lodge a complaint for non-receipt of investor services within the stipulated timelines mentioned herein above by the RTA, by giving details of their name, folio no., DP ID / Client ID, Email address, Mobile Number, nature and full particulars of their complaint directly to the Company at complianceofficer@geplcapital.com.
- The Company shall redress investor grievance promptly but not later than 21 calendar days, or within such time as may be provided by the SEBI, from the receipt of the grievance in such manner as specified by the SEBI.

- Only complaints sent to the addresses / email ids mentioned in this Policy will be treated as valid complaints. Email received from the registered email id of shareholder/letter received under the signature of shareholder shall be treated as valid communication/complaint.
- In case, the Company fails to redress the complaint within the timeline provided herein, the investor may then file their complaint through SCORES platform of SEBI. In case any complaint is directly received by the Company through SCORES, the Company shall resolve the complaint promptly & not later than 21 days from the date of receipt of complaint and upload the Action taken report ('ATR') on SCORES within 21 days of receipt of the Complaint. The ATR will be automatically routed to the complainant.
- Investors are entitled to review their complaints on SCORES as per detailed procedure outlined in relevant SEBI circular. The complainant in the event of being dissatisfied shall give reasons for not being satisfied with the ATR and provide clear reasons for review at any stage, as mentioned in the SEBI circular SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023, as amended from time to time.
- The Investor may also choose to opt remedies through the Online Dispute Resolution mechanism in case they are not satisfied with the disposal on Scores post SEBI review. A detailed process is given in the applicable Master Circular for Online Dispute Resolution SEBI/
- HO/OIAE/OIAE_IAD-3/P/CIR/2023/195 updated as on December 28, 2023.

Investor Grievance (Trading and DP)

Escalation Matrix (Annexure A)

As per NSE Circular No. NSE/ISC/52517 dated 03rd June 2022, BSE Circular No. : 20220614-15 dated 14th June 2022 and CDSL communique: CDSL/IG/DP/2022/468 dated August 17, 2022

Details of	Contact Person	Address	Contact No.	Email Id
Client Servicing / Customer Care	Mr. Manoj Gangurde	D-21, Dhanraj Mahal, CSM Marg Colaba, Mumbai, 400001	022-66142701	complaints@geplcapital.com
Head of Client Servicing / Customer Care	Mr. Manoj Gangurde		022-66142703	support@geplcapital.com
Compliance Officer	Mr. Subhash Sharma Ms. Nickey Desai (DP)		022-66182400	complianceofficer@geplcapital.com
Chief Executive Officer (CEO)	Mr. Vivek Gupta (Director)		022-66182471	director@geplcapital.com

In absence of response/complaint not addressed to your satisfaction, you may lodge a complaint with

1. CDSL at <https://www.cdslindia.com/Footer/grievances.aspx> -(in case of DP transaction)
2. BSE at <https://bsecreg.bseindia.com/ecomplaint/frmlInvestorHome.aspx> -(in case of BSE transaction)
3. NSE at <https://investorhelpline.nseindia.com/NICEPLUS/> -(in case of NSE transaction)

OR

4. SEBI at <https://scores.gov.in/scores/Welcome.html>

Please quote your Service Ticket/Complaint Ref No. while raising your complaint at SEBI SCORES/Exchange portal.

This circular is available on SEBI website at www.sebi.gov.in.

For **GEPL CAPITAL PVT. LTD.**

Sd/-



Mr. Vivek I. Gupta

Director