

Complaint Handling and Grievance Redressal Policy

1. OBJECTIVE

This policy aims to establish a robust mechanism for the timely and efficient resolution of consumer grievances, in line with IFSCA regulations. It ensures that complaints are handled in a fair, transparent, and accountable manner, with a consumer-first approach.

2. APPLICABILITY

This policy applies to all consumer complaints received by Estee IFSC Private Limited, except for exclusions as outlined in Section 4 below.

DEFINITIONS

As per the IFSCA Circular Reference. No. IFSCA-LPRA/3/ 2024-Legal and Regulatory Affairs

“Complaint Redressal Appellate Officer” or “CRAO” shall be a senior level person of the Regulated Entity designated for handling appeals of consumers against the decision taken by the Complaint Redressal Officer of the Regulated Entity;

“Complaint Redressal Officer” or “CRO” shall be an employee of the Regulated Entity responsible for handling of complaints received from its consumers;

“Consumer” shall have the same meaning as assigned to “Client” or “Customer” under clause 1.3.11 of the IFSCA (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines, 2022;

“Regulated Entity” shall have the same meaning as assigned to it under clause 1.3.35 of the IFSCA (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines, 2022;

Complaint: Any consumer grievance related to financial products or services offered by Estee IFSC Private Limited.

Inclusions & Exclusions: Refer to complaints or issues outlined in Section 4 - Exclusions.

3. GRIEVANCE REDRESSAL FRAMEWORK

3.1 RECEIVING COMPLAINTS

Consumers can lodge complaints through the following channels:

Designated Email ID: investorgrievances@esteeadvisors.com

Physical Submission: Complaints may be sent via letters or personal visits.

Regulatory Platforms: Complaints directly forwarded by IFSCA or other regulatory authorities.

Acknowledgment:

All complaints are acknowledged within **3 working days** of receipt.

Rejected complaints include reasons for non-acceptance within **5 working days**.

3.2 RECORDING OF COMPLAINTS

The Compliance Department maintains an Investor Complaint Register that includes:

- Consumer details (Name, Account details, Broker/sub-broker, etc.).
- Description and date of the complaint.
- Resolution timelines and actions taken.

All records are preserved electronically for **six years** from the resolution date or longer if litigation or regulatory inquiries are ongoing.

3.3 HANDLING OF COMPLAINTS

Assessment:

The **CRO** reviews all complaints impartially. If the complaint involves a transaction the CRO handled, another designated officer assumes the responsibility.

Seeking Additional Information:

The CRO may request further information or supporting evidence from the complainant or relevant departments.

Resolution Timelines:

Complaints are resolved preferably within **15 working days** of acknowledgment.

Complex complaints are addressed within a maximum of **30 calendar days**.

Escalation:

If relevant departments or personnel do not respond within **7 working days**, the matter is escalated to the **CRAO** (Designated Director).

Sign-Off:

Resolved cases are formally closed with a CRO sign-off.

For unresolved or rejected complaints, written reasons are provided to the consumer.

3.4 APPEAL MECHANISM

Consumers dissatisfied with the CRO's decision can appeal to the CRAO (Designated Director) within **21 calendar days** of receiving the resolution.

Appeal Resolution Timelines:

Review by CRAO: All appeals are disposed of within **30 calendar days** of receipt.

Notification of Decision: The CRAO informs the complainant of the final decision in writing.

3.5 ESCALATION TO IFSCA

If the complainant remains dissatisfied, they may lodge a complaint with the IFSCA within **21 calendar days** of the CRAO's decision.

Contact E-mail: grievance-redressal@ifsc.gov.in

Complaints escalated to IFSCA must follow timelines specified above.

Note : *Complaints specific to trading members, clearing members, or depository participants must be submitted to their respective market infrastructure institutions first.*

4. INCLUSIONS

- 1) Non- receipt of documents viz member client agreement, contract notes, settlement of accounts, order trade log etc.
- 2) Non- refund of margin money
- 3) Trades executed without adequate margins
- 4) Delay /non – receipt of funds
- 5) Squaring up of positions without consent
- 6) Unauthorized transaction in the account
- 7) Unauthorized transfer of funds from client account to other accounts
- 8) Technology related issues and cybersecurity

EXCLUSIONS

- 1) Anonymous complaints (except whistleblower complaints)
- 2) Incomplete or un-specific complaints
- 3) Allegations without supporting documents
- 4) Suggestions or seeking guidance/explanation
- 5) Complaints on matters not relating to the financial products or services provided by the Regulated Entity
- 6) Complaints about any unregistered/ un-regulated activity
- 7) References in the nature of seeking information or clarifications about financial products or services

5. RECORD-KEEPING

Records maintained for all complaints include:

- a. Complaints received and processed;
- b. All correspondence exchanged between the Regulated Entity and the complainants;
- c. All information and documents examined and relied upon by the Regulated Entity while processing of the complaints;
- d. Outcome of the complaints;
- e. Reasons for rejection of complaints, if any;
- f. Timelines for processing of complaints; and
- g. Data of all complaints handled by it.

Retention Period: Six years from the resolution date or longer if required due to litigation or inquiries.

6. REPORTING AND TRANSPARENCY

Estee IFSC Private Limited ensures:

Complaint Statistics: Estee IFSC shall display the information on complaint handling on its dedicated webpage of its Group Entity, as applicable, under the heading “Complaint Handling and Grievance Redressal”, on an annual basis.

Regulatory Reports: Estee IFSC Private Limited shall file reports on handling of complaints in the form and manner specified by the Authority from time to time.

7. ROLES AND RESPONSIBILITIES

- **Complaint Redressal Officer (CRO)**

The **Compliance Officer**, acting as CRO, ensures adherence to grievance redressal procedures, manages complaint resolutions, and signs off on resolved cases.

- **Complaint Redressal Appellate Officer (CRAO)**

The **Designated Director** serves as the CRAO, independently resolving appeals and ensuring finality in grievance redressal processes.

8. MONITORING AND REVIEW

Policy Reviews:

This policy shall be reviewed **Annually**, or as mandated by statutory updates or management discretion for any significant operational or regulatory developments that warrant policy updates.