

**EQUITREE CAPITAL ADVISORS PRIVATE LIMITED**  
**GRIEVANCE REDRESSAL POLICY**

<b>Version Number</b>	<b>Date of creation / change</b>	<b>Author</b>	<b>Update information</b>
V1.0	01.04.2023	Compliance Team	First published version
V2.0	11.12.2023	Compliance Team	Revised as per SEBI Circular for Redressal of investor grievances through SCORES and Online Dispute Resolution Platform

## Table of Contents

1. Introduction .....	3
2. Regulatory Requirement.....	3
3. Background .....	3
4. Scope.....	4
a. Complaint handling Procedure:.....	4
b. Acknowledgement of the Complaint:.....	5
c. Response to the client and turnaround time(TAT): .....	5
5. Review of the Policy .....	6

## 1. Introduction

Equitree Capital Advisors Private Limited, (also referred herein as Equitree Capital or the Company) is a SEBI registered PMS bearing certificate Registration No. INP000005777 dated 28.07.2017.

## 2. Regulatory Requirement

SEBI vide Circulars no. CIR/OIAE/1/2014 dated 18<sup>th</sup> December, 2014 regarding redressal of investor grievances through SEBI Complaints Redress System (SCORES) platform and circular no. SEBI/HO/OIAE/IGRD/CIR/P/2018/58 dated 26<sup>th</sup> March 2018 regarding Investor grievance redress mechanism specifying new policy measures, has advised the Market Intermediaries to form and adopt a comprehensive Investor Grievance Redressal Policy.

As per Regulation 34 A, ' The Portfolio Manager shall redress investor grievances promptly but not later than twenty-one calendar days from the date of receipt of the grievance and in such manner as may be specified by the Board.

In order to enhance transparency in the Investor Grievance Redressal Mechanism, all Portfolio Managers on a monthly basis shall disclose on their websites, the data pertaining to all complaints including SCORES complaints received by them in the format mentioned in [Annexure 7A](#) of the Master Circular dated March 20, 2023. The information shall be made available by 07<sup>th</sup> of the succeeding month.

Accordingly, this policy document has been framed and adopted by the Company.

## 3. Background

Customer satisfaction is core to any service industry. With this perspective it is imperative that an organization have an investor grievance policy to set forth the policy on **all types of queries**

/ **complaints received and methodology for quick redressal of the same.** The policy also lays down the responsibility and turn-around time for redressal of such queries / complaints taking into consideration the regulatory timelines and redressal mechanisms.

## 4. Scope

The policy aims to address the following:

- a) Complaint handling procedures
- b) Acknowledgement to client or Complainant
- c) Response to the client and turnaround time (TAT)

### a. Complaint handling Procedure:

#### **Level 1**

The investors can contact Equitree Capital at : +91 22 49726816.

#### **Level 2**

In line with regulatory requirements, the Company has set up a designated email Id viz. [info@equitreecapital.com](mailto:info@equitreecapital.com) for receiving client complaints. This email ID shall be communicated to customers on phone, displayed on website, published on the communications sent to clients. This email id shall be accessed by the Compliance officer of the Company.

If the customer's issue remains unresolved after a period of 15 days from the date of first raising the issue at Level 1 or if the customer is not satisfied with the response provided at Level 1, the Customer may, post completion of a 15 day period from the date of first raising the issue at Level 1, write to the Compliance Officer at: [mahima@equitreecapital.com](mailto:mahima@equitreecapital.com).

#### **Level 3**

If the customer's issue is unresolved for a period of 20 days after the Customer reaches out to the Compliance Officer as provided in Level 2, the Customer may write to the Director of the company at [pawan.b@equitreecapital.com](mailto:pawan.b@equitreecapital.com).

#### **Level 4**

If the complaint is not resolved at Level 3 within a period of 30 days from the date of such issues first being raised at the Level 3, or if the customer is not satisfied with the Company's grievance redressal, the customer may, after completion of 30 days after the issue was first raised at Level 3, approach SEBI at: [www.scores.gov.in](http://www.scores.gov.in).

Detailed procedure for SCOREs can be accessed through SEBI Circular no. No. SEBI/HO/MIRSD/MIRSD6/CIR/P/2017/20, dated March 10, 2017, no. SEBI/HO/OIAE/IGRD/CIR/P/2018/58 dated March 26, 2018 and SEBI/HO/IMD/IMD-II\_DOF7/P/CIR/2021/681 dated December 10, 2021.

#### **b. Acknowledgement of the Complaint:**

A correspondence either by letter, Chat or E-mail or any other channel of communication (where audit trail can be maintained), shall be made with the investor who has submitted a written query / complaint acknowledging receipt of the complaint within 2 working days of the receipt of the complaint.

#### **c. Response to the client and turnaround time(TAT):**

The Company endeavors to address and resolve all complaints received from an aggrieved investor within the regulatory TAT of 21 days. Immediately on receipt of the complaint the following action shall be initiated:

- a) Status of redressal of complaints received from the Regulator shall be informed to them through Letters / email and if any telephonic enquiry is received from them, full details of the case and status of redressal are provided over the phone.

- b) Details of the complaints received (resolved and open), if any, shall also be placed before the Board of Directors of the Company for information and record.

## 5. Online Resolution of Disputes in the Indian Securities Market

As per SEBI circular no SEBI/HO/OIAE/OIAE\_IAD-1/P/CIR/2023/145 dated July 31, 2023, all listed companies / specified intermediaries / regulated entities in the securities market (collectively referred to as “Market Participant/s”) shall enrol on the ODR Portal within the timelines as specified in the SEBI circular and shall be deemed to have been enrolled on the ODR Portal at the end such specified timeline. The enrolment process shall also include executing electronic terms/agreements with the ODR Institutions, which shall be deemed to be executed at the end such specified timeline. Facility to enrol Market Participants into the ODR Portal by utilising the credentials used for SEBI SCORES portal / SEBI Intermediary portal may be also provided in the ODR Portal.

All market participants are advised to display a link to the ODR Portal on the home page of their websites and mobile apps.

## 6. Review of the Policy

The Policy on Code of Conduct shall be reviewed annually or as and when any change is advised by the Regulator.