

Complaint Handling and Grievance Redressal Policy of Findoc Investmart (IFSC) Private Limited

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Introduction

The International Financial Services Centres Authority (IFSCA), through its circular F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 02, 2024, has emphasized the importance of protecting the interests of financial consumers in the IFSC. It mandates all regulated entities to establish a robust framework for handling complaints and resolving grievances in a fair, transparent, and efficient manner. The circular necessitates the regulated entities which include the broker dealer to have a policy on handling of complaints and grievance redressal.

In compliance with the aforementioned regulatory guidelines, this policy outlines the framework for receiving, handling, and resolving client complaints and grievances, while fostering transparency, accountability, and client satisfaction.

Objective

This policy aims to establish a structured, efficient, and transparent mechanism for the handling and redressal of client complaints and grievances by Findoc Investmart IFSC Private Limited in compliance with the rules, regulations and framework as stipulated by International Financial Services Centres Authority (IFSCA), NSE International Exchange (NSE IX), India International Exchange (India INX), India International Bullion Exchange (IIBX) and any other market infrastructure institution where Findoc IFSC is associated with.

Applicability

This policy applies to:

- a. UCC Clients associated with Findoc IFSC
- b. Trading Members (TMs) associated with Findoc IFSC
- c. Remote Trading Participants (RTPs) associated with Findoc IFSC

Key Definitions

- a. "Client" shall have the same meaning as defined under clause 1.3.11 of the IFSCA (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines, 2022
- b. "Complaint Redressal Officer" or "CRO" shall be an employee of Findoc IFSC responsible for handling of complaints received from its clients;
- c. "Complaint Redressal Appellate Officer" or CRAO shall be a senior level person of Findoc IFSC designated for handling appeals of clients against the decision taken by the Complaint Redressal Officer of the Regulated Entity.

Policy Guidelines

General Provisions

- a. Findoc IFSC shall establish procedures for complaint handling and grievance redressal tailored to the nature, scale, and complexity of its operations.
- b. The policy on Complaint Handling and Grievance Redressal shall be prominently disclosed on the website of Findoc IFSC. The name and contact details of the Complaint Redressal Officer and the Complaint Redressal Appellate Officer shall also be prominently displayed under this section.
- c. An indicative list of matters not considered as 'complaint' has been mentioned in Annexure 1.

Complaint Handling Procedure

Complaint Submission

- i. Complaints can be submitted through physical form along with the supporting documents at our registered office either in person or by post or through email at ifscgrievance@myfindoc.com, or any other medium as provided by Findoc IFSC from time to time.
- ii. The complaint shall include all relevant details and supporting documentation. Findoc IFSC shall acknowledge complaints within 3 working days of receipt of the complaint.
- iii. The Complaint Redressal Officer (CRO) shall assess the complaint, ensure its validity to ascertain acceptance or rejection of the complaint.
- iv. If the complaint is not accepted, the complainant shall be informed within 5 working days from the date of receipt of the complaint with reasons for non-acceptance.

Complaint Processing and Resolution

- i. Complaints shall be handled in a fair, transparent, and professional manner.
- ii. The CRO shall ensure impartiality in resolving complaints. If the CRO is involved in the subject transaction, an alternate officer will be designated.
- iii. Findoc IFSC may seek additional information or documents from the complainant for effective resolution.
- iv. Complaints shall be resolved preferably within 15 days but no later than 30 days of acceptance.
- v. Rejected complaints shall include written reasons for rejection.

Appeal Mechanism

- i. A client who is not satisfied with the resolution or rejection of a complaint may file an appeal with the Complaint Redressal Appellate Officer (CRAO) within 21 days of receiving the CRO's decision.
- ii. The CRAO shall dispose of the appeal within 30 days.

Escalation to Exchange, Depository or Regulator

Where a complainant is not satisfied with the decision of Findoc IFSC and has exhausted the appellate mechanism of Findoc IFSC, he may file a complaint before the Authority through email to grievance-redressal@ifsc.gov.in preferably within 21 days from the receipt of the decision from Findoc IFSC.

Provided that, the complainant shall first approach the relevant market infrastructure institution for redress of the complaint. The client can refer to the website of the relevant MIIs for more details on their redressal grievance framework.

Reporting and Disclosures

- a. This policy, including the names and contact details of the CRO and CRAO, shall be prominently displayed on the website of Findoc Investmart IFSC Private Limited under the heading "Complaint Handling and Grievance Redressal."
- b. Complaint handling data (received, resolved, rejected, and pending) shall be included in the annual report under "Complaint Handling and Grievance Redressal." If not applicable, data shall be disclosed on the website.

- c. Findoc Investmart IFSC Private Limited shall submit periodic reports to Exchange, Depository and IFSCA in the format prescribed by the MIs and Regulator from time to time.

Record Maintenance

Findoc IFSC will maintain all records of complaints, including correspondence and resolutions, in an electronic format for at least eight years or as prescribed under applicable regulations.

Appointment of CRO and CRAO

Findoc Investmart IFSC Private Limited has appointed the following persons to perform the role of CRO and CRAO.

Role	Name	Email ID	Contact Number
CRO	Ridhdhi Vekariya	ifscgrievance@myfindoc.com	+91 7984391499
CRAO	Mayank Gurnani	mayank.gurnani@myfindoc.com	+91 9638447003

Role of Compliance Officer

The Compliance Officer shall oversee adherence to regulatory requirements and ensure complaints are resolved as per this policy.

Amendments

This policy shall be reviewed once in two years or earlier if any regulations/ guideline/circulars etc require a change to any of the policy provisions. This is to ensure compliance with applicable regulatory norms.

Annexure 1**List of matters not considered as “Complaint”**

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 Findoc Investmart IFSC Private Limited.
6. Complaints about any unregistered/ un-regulated activity.
7. References in seeking information or clarifications about financial products or services.
8. Complaint involving payment of funds and transfer of securities to entities other than Findoc Investmart IFSC Private Limited.
9. Claim for notional loss, opportunity loss for the disputed period or trade.