



SAPHALATA
Investment Advisors Private Limited

Grievance Redressal Policy

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1. Objective:

The objective of this policy is to establish a comprehensive framework for addressing investor grievances in a timely, transparent, and efficient manner. This policy aims to ensure compliance with SEBI guidelines, protect investor interests, and foster trust and confidence among stakeholders.

2. Scope:

This policy applies to all investor grievances received by Saphalata Investment Advisors Private Limited ("the Company") through any channel, including direct communication, SEBI Complaint Redressal System (SCORES), or other regulatory platforms. It covers complaints related to services provided by the Company and ensures that all grievances are resolved in accordance with SEBI regulations.

3. Level 1: Raise with Company:

Investors are encouraged to first approach the Company directly for resolution of their grievances.

a. Complaints can be submitted via below at the contact information given on the front page of the policy:

i. Email: Investors may send their complaints to the designated grievance redressal officer at the official email address.

ii. Phone: Investors may contact the grievance redressal officer via the official phone number.

iii. Written Communication: Complaints can be submitted in writing to the Company's registered office.

b. Acknowledgment of Complaints:

The Company shall acknowledge receipt of the complaint within 3 working days of receiving it.



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The acknowledgment shall include a unique reference number for tracking the complaint and details of the grievance redressal process.

c. Resolution Timeline:

The Company shall resolve all complaints within 21 calendar days from the date of receipt.

An Action Taken Report (ATR) shall be submitted to the complainant and, if applicable, uploaded on SCORES.

d. Monitoring and Escalation:

If the complainant is dissatisfied with the resolution provided, they may request a review within 15 calendar days of receiving the ATR.

The Company shall re-evaluate the complaint and provide a revised resolution within 10 calendar days.

4. Level 2: SEBI Complaints Redress Systems:

If the grievance is not redressed, the complainant may, in accordance with the SCORES guidelines, escalate the same through the SEBI's web-based complaints redress system (SCORES) portal i.e. (<https://scores.sebi.gov.in>) in accordance with the process laid out therein.

The complainant may also make use of the SCORES facility for any escalations of the same grievances. Further, SEBI vide press release PR No. 80/2012 dated August 30, 2012 has made available to investors its toll-free helpline service for investors (1800 22 7575 / 1800 266 7575) on all days i.e.; Monday to Sunday. For any queries/ feedback or assistance, the complainant may also e-mail to asksebi@sebi.gov.in.

5. Level 3: ODR Platform:



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In case the complainant is still not satisfied with the resolution provided at Level 1 or 2, then the online dispute resolution process can be initiated through the Online Dispute Resolution Portal (ODR Portal).

At the same time, the Company may also initiate dispute resolution through the ODR Portal after having given due notice of at least 15 calendar days to the investor/client for resolution of the dispute which has not been resolved.

ODR Portal can be accessed at <https://smartodr.in/> w.e.f. 15th September 2023. The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in terms of the paragraph above or SCOREs guidelines as applicable or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law (including when moratorium under the Insolvency and Bankruptcy Code is in operation due to the insolvency process or if liquidation or winding up process has been commenced against the Company). All disputes raised through ODR Portal shall be resolved in accordance with the guidelines of such ODR mechanism which may include conciliation, online arbitration. The dispute resolution through the ODR Portal can be initiated when within the applicable law of limitation (reckoned from the date when the issue arose/occurred that has resulted in the complaint/date of the last transaction or the date of disputed transaction, whichever is later). SEBI vide its circular no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/131 dated July 31, 2023 read with SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/135 dated August 4, 2023 and SEBI/HO/OIAE/OIAE_IAD 3/P/CIR/2023/191 dated December 20, 2023, had issued guidelines for online resolution of disputes in the Indian securities market through establishment of a common ODR Portal which harnesses online conciliation and online arbitration for resolution of disputes arising between Clients and the Company. These regulatory norms as stated in the aforesaid SEBI circulars are consolidated within the SEBI master circular SEBI/HO/OIAE/OIAE_IAD-3/P/CIR/2023/195 dated December 28, 2023. Also, SEBI circular SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023 explained in detail the mechanism for invoking Redressal of investor grievances through the SEBI SCORES Platform and



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linking it to ODR Platform i.e. <https://smartodr.in/login>. All matters that are appealable before the Securities Appellate Tribunal in terms of Section 15T of SEBI Act, 1992 (other than matters escalated through SCOREs portal in accordance with SEBI SCOREs Circular), Sections 22A and 23L of Securities Contracts (Regulation) Act, 1956 and 23A of Depositories Act, 1996 shall be outside the purview of the ODR Portal. The venue and seat of the online proceedings under ODR Portal shall be deemed to be the place as specified in Master Circular For Online Dispute Resolution (SEBI/HO/OIAE/OIAE_IAD 1/P/CIR/2023/131 dated July 31, 2023).

6. Other remedies:

If the complainant remains dissatisfied with the remedies offered or the stand taken by the Company, the complainant and the Company have the alternative option to follow Arbitration Mechanism as described in the Fund Documents (in case of AIF) or Portfolio Investment Management Agreement (in case of PMS) or any Supplemental Agreement thereto subject to the aforementioned regulations and any amendments made thereto from time to time. Further, all the legal actions and proceedings shall be subject to the jurisdiction of court in Mumbai only and are governed by Indian laws.

7. Exclusions:

The following types of complaints shall not be handled under this policy:

- Complaints against unlisted/delisted companies.
- Cases pending in courts or quasi-judicial proceedings.
- Complaints under the purview of other regulatory bodies (e.g., RBI, IRDAI).
- Complaints against companies under liquidation or resolution under the Insolvency and Bankruptcy Code.
- Complaints related to market intelligence or violations of securities laws.

8. Designated Grievance Redressal Officer:



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The Company shall appoint a Grievance Redressal Officer responsible for:

- Receiving and addressing investor complaints.
- Ensuring timely resolution of grievances.
- Coordinating with SEBI and other regulatory bodies as required.

9. Investor Rights:

Investors have the right to:

- Receive acknowledgment of their complaints within the stipulated timeline.
- Obtain a resolution within the specified period.
- Escalate unresolved complaints to SEBI or other regulatory bodies.
- Seek legal remedies if dissatisfied with the resolution provided.

10. Confidentiality:

The Company shall ensure that all investor information and complaint details are handled with utmost confidentiality. Adequate systems shall be in place to prevent data leakage and unauthorized access.

11. Implementation Timeline:

This policy shall be effective immediately and shall be reviewed periodically to ensure compliance with SEBI regulations and address emerging needs in grievance redressal.

12. Monitoring and Reporting:

The Company shall maintain records of all complaints received and resolved. Periodic reports shall be shared with SEBI or other regulatory bodies as required.

The Company shall ensure that all complaints are tracked and monitored to avoid delays in resolution.



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13. Review and Amendments:

This policy shall be reviewed annually or as required to incorporate changes in regulatory requirements or operational processes. Any amendments to the policy shall be communicated to all stakeholders promptly.