

INVESTORS GRIEVANCE REDRESSAL POLICY

MERCHANT BANKING



SUMEDHA
adding values to value


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PREAMBLE

Sumedha Fiscal Services Limited (“SFSL” or “the Company”) believes that quick and effective handling of complaints as well as prompt corrective & preventive actions and processes are essential for providing our services. This policy document is to enable to put in place an effective and suitable mechanism for receiving and addressing complaints from investors with specific emphasis on resolving such complaints fairly and expeditiously.

Objective of this policy document is to ensure that:

-  Issues raised by investors are dealt with courtesy and are resolved on time.
-  The Company will treat all the complaints efficiently and fairly without any bias.

DEFINITIONS

- a) **Investor** mean an individual, entity, body corporate or such other person who shall be an investor in securities or would be investing in securities of an entity related to any of the transactions undertaken by SFSL in its capacity as a Merchant Banker.
- b) **Complaint or Grievance:** is an expression of dissatisfaction made by the Investor related to the services of Sumedha Fiscal Services Limited in its capacity as a Merchant Banker and/ or its Client including in respect of any disclosure/ process/ information in any of the transaction undertaken by SFSL in its capacity as a Merchant Banker.

This however needs to be differentiated from matters like from general feedback, enquiry, request made before the due date.
- c) **Client** shall mean client/ customer of Sumedha Fiscal Services Limited.
- d) **Redressal** can be defined as a process or action resulting in giving a solution or response to the problem faced or concern raised by an Investor.

GUIDING PRINCIPLE

Transparency: The Investor to be provided with information regarding the channels to convey and resolve their issues. In addition, if the resolution is expected to take longer time, same should be communicated to the Investor.

Accessibility: The Company will enable the Investor to communicate their complaints or grievances and avail redressal services through multiple channels.

Escalation: Information on the process of escalation of complaints to higher level, in case the Investor is not satisfied with the resolution provided by the current person handling the same.

GRIEVANCE RAISING MECHANISM

Investor can seek clarifications to their query and are further entitled to make a complaint in writing. Investors are requested to approach the Compliance Officer (Merchant Banking division) directly, and in the normal course can expect a response within 7 business days of the query or complaint registration.

Contact Details for Investor's queries and complaints

Name: Mr. Ajay Kumar Laddha

Address: 8B Middleton Street, 6A Geetanjali, Kolkata - 700 071

Email: ajay_laddha@sumedhafiscal.com

Phone: +91 983 061 2006 (on any business day between 10.00 am to 05.00 pm)

Investor may also approach Mr. Bijay Murmuria, Director, Sumedha Fiscal Services Limited

Email: Bijay_murmuria@sumedhafiscal.com

Phone: +91 33 2229 8936

SCORES Portal

In case the Company has rejected the Complaint or the Complainant has not received any communication from the concerned Company or is not satisfied with the reply received or the redressal by the Company, the Investor may file their complaint in SCORES 2.0 portal of SEBI. The Investor may lodge the Complaint against the Company on SCORES 2.0 Portal within a period of one year from the date of occurrence of the cause of action i.e., rejection of complaint or non-receipt of any communication or reply / redressal received being not satisfactory.

The Investor needs to register on the SEBI SCORES 2.0 portal at <https://scores.sebi.gov.in/scores-home> by clicking on "Sign Up" and selecting the category as "Investor". Details like Name of the Investor, Permanent Account Number (PAN), contact details, email-id, etc. are required at the time of registration on the Scores 2.0 Portal.

Upon successful registration, a unique user id and a password shall be generated and communicated through an acknowledgement email to the Investor. The Investor may then proceed to submit a complaint or grievance directly to Sumedha Fiscal Services Limited under the 'Merchant Bankers' category.

The Company shall resolve the complaint and upload the Action Taken Report ("ATR") on SCORES 2.0 within the timeline prescribed as per the SEBI Grievance Redressal circular. The ATR uploaded by the Company will be automatically routed to the complainant.

In case, the Investor is not satisfied with the resolution provided, the Investor may request for a review of the resolution provided by the entity within 15 calendar days from the date of the ATR by the Company. In case of review, the Association of Investment Bankers of India ("AIBI" or "the Designated Body"), being the Designated Body specified by SEBI, shall take

cognizance of the complaint through SCORES 2.0 and seek clarifications from the Company. The Designated Body shall submit the revised ATR to the Investor on SCORES 2.0 within the timeline prescribed as per the SEBI Grievance Redressal circular.

In case the Investor is not satisfied with the resolution provided after the review process stated above, the Investor may request for a second review of the resolution provided within 15 calendar days from the date of the revised ATR by the Designated Body. In case of second review, SEBI may take cognizance of the complaint through SCORES 2.0 and seek clarifications from the Company and/or the Designated Body. The Company shall provide clarification to the respective Designated Body and/or SEBI, wherever sought and within such timeline as specified. The second review Complaint shall be treated as 'resolved' or 'disposed' or 'closed' only when SEBI 'disposes' or 'closes' the Complaint in SCORES 2.0.

ONLINE DISPUTE RESOLUTION (ODR)

After exhausting the options for resolution of the grievance as mentioned in the paragraphs above, if the Investor is not satisfied with disposal of complaint on SCORES 2.0 portal post SEBI review or in cases where the issues raised require adjudication on any third party rights, on questions of law or fact or which is in the nature of a lis between the parties, the Investor shall seek appropriate remedies through the Online Dispute Resolution (<https://smartodr.in/login>) mechanism in securities market. In addition, the Investor has the option to approach legal forums including civil courts, consumer courts etc.

In case the Investor opts for Online Dispute Resolution mechanism or other appropriate civil remedies at any point of time while the complaint is pending on SCORES 2.0, the pending Complaint shall be treated as disposed on SCORES 2.0 portal.

The Investor may also contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on the SCORES 2.0 platform. The list of IAs is available at www.sebi.gov.in.

AMENDMENTS AND LIMITATIONS

This Policy may be reviewed and amended periodically as and when required to ensure that it meets the objectives of the relevant legislation and needs of the Company and remains effective.

In the event of any amendment(s), clarification(s), circular(s), provision(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then the same shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly.

Further, in the event of any conflict between the provisions of this Policy and the Merchant Banking Regulation or any other statutory enactments or rules and SEBI Circulars, the provisions of Merchant Banking Regulations or statutory enactments or Rules made thereto, and SEBI Circular shall prevail over this Policy.
