A. K. CAPITAL FINANCE LIMITED

BUILDING BONDS

INVESTOR GRIEVANCE REDRESSAL MECHANISM

Approved/ Amended of the Mechanism	Board Meeting Date(s)
Adoption	October 30, 2023
Amendment	May 11, 2024
Amendment	May 17, 2025
Amendment	January 31, 2026

Last reviewed on January 31, 2026

Contents

PART A – Investor Grievance Redressal Mechanism as per SEBI 5

1) Introduction: 5
2) Applicability and Objective: 5
3) Definition: 5
4) Steps for handling Investor Grievances: 6
5) Resolution mechanism for offline complaints: 8
6) Resolution mechanism for online complaints through SCORES: 8
7) Initiation of the dispute resolution process through the Online Dispute Resolution ("ODR") portal 9
8) Stakeholders Relationship Committee: 10
9) Review and Amendment: 10

Annexure I - "Nature of Complaints" 11
Annexure II - "Online Redressal Mechanism" 12
Annexure III - "Actions in case of non-compliances" 13
Annexure IV - "Complaint/ Grievance Form" 14

PART B – Investor Grievance Redressal Mechanism as per Digital Personal Data Protection Act, 2023 15

1) Introduction: 15
2) Objective: 15
3) Definitions: 15
4) Grievance Redressal Officer/ Data Protection Officer: 16
5) Grievance Resolution Process 16

Annexure I - "Complaint/ Grievance Form under DPDP Act" 18

INVESTOR GRIEVANCE REDRESSAL MECHANISM

PART A – Investor Grievance Redressal Mechanism as per SEBI

1) Introduction:

A. K. Capital Finance Limited ("**AKCFL**" or "**the Company**") believes that Investor service is a vital element for sustained business growth and for better corporate governance. The Company's approach is to treat and service all the investors consistently and fairly. The Company endeavours to address all grievances/ complaints, in a reasonable time and satisfactory manner. Investor grievances/ complaints constitute an important voice of Investor and thus a structured grievance redressal framework is important.

Grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in future. The Company realizes that quick and effective handling and resolution of Investors' grievances is essential. This mechanism shall ensure that all grievances/ complaints shall be heard and the response would be sent for such grievances/ complaints. The Investor Redressal Mechanism of the Company is based on the following principles:

a) Investors are treated fairly at all times.
b) Grievances/ complaints raised by Investors are dealt with courtesy and in a timely manner.
c) Grievances/ complaints are treated efficiently and fairly.
d) The employees and management of the Company work in good faith and towards the interests of the Investors.

2) Applicability and Objective:

SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 mandates implementation of Investor Grievance Mechanism by all the listed entity to address the complaints/ grievances of any of its investors. Accordingly, in view of the regulatory requirement and to ensure prompt resolution, the Company has laid down the appropriate Grievance Redressal Mechanism to resolve grievances/ complaints of its investors.

All the investor grievances/ complaints registered with the Company shall be reviewed, monitored and resolved in compliance with the provisions of the applicable laws. The focus shall be, to ensure all grievances are resolved in a timely basis and to the full satisfaction of the investors.

The Company has designated the Investor Grievance Redressal Officer appointed under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, who can be approached in case of any grievance/ complaint.

3) Definition:

a) **"Act"** means Securities and Exchange Board of India Act, 1992, as amended from time to time.

b) **"Board"** means Board of Directors of the Company, as constituted from time to time..

c) "**Company**" means A. K. Capital Finance Limited.

d) "**Grievance**" means any written grievance or complaint related to any of the securities of the Company and/ or specified in "Annexure I" of this Mechanism.

e) "**Investor**" includes any investor in the securities of the Company as well as potential investor who has applied/ submitted application for subscribing the securities issued by the Company.

f) "**Investor Grievance Redressal Officer**" means the Compliance Officer appointed under the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

g) "**Listing Regulations**" means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

h) "**Mechanism**" means this Investor Grievance Redressal Mechanism of the Company.

i) "**SEBI**" means Securities and Exchange Board of India.

Wherever appropriate in this Mechanism, a singular term shall be construed to mean the plural where necessary and a plural term the singular. Similarly, any masculine term shall also be construed to mean the feminine or any other gender and vice versa.

Words or phrases not defined above or anywhere in this Mechanism shall have same meaning ascribed to them under the Act or Listing Regulations or Circulars notified by SEBI.

4) Steps for handling Investor Grievances:

a) The procedure and actions mentioned in this mechanism shall only be applicable for categories of complaints listed in "**Annexure I"**. The details of the Online Redressal Mechanism and the process flow are provided in "**Annexure II**". The details of the actions against listed companies in case of any failure to redress investor grievances received through SCORES 2.0 and the grievance remains pending beyond 60 days by the Company are provided in "**Annexure III**".

b) The Company has a designated email id i.e. csakcfl@akgroup.co.in for handling investor grievances on which investors can submit his/ her grievances/ complaints in the format provided in "**Annexure IV**". The contact details of the Investor Grievance Redressal Officer and in case of escalation, the contact details of the Managing Director along with and the Complaint/ Grievance Form is available on the website of the Company (https://www.akgroup.co.in).

c) Also, an Investor shall make a written grievances/ complaints marking it to the Investor Grievance Redressal Officer, A. K. Capital Finance Limited, 601-602, 6th Floor, Windsor, Off CST Road, Kalina, Santacruz (E), Mumbai - 400 098.

d) The Investor Grievance Redressal Officer tracks the grievances/ complaints received on the designated e-mail ID or through any other mode on a regular basis. The said compliant/ grievance shall be resolved within 21 calendar days from the day of receipt of complaint.

e) The investors wish to lodge a complaint on SCORES 2.0 (complainant) are required to register themselves on SCORES 2.0 portal of SEBI by clicking on "Sign up" and selecting the option of "Investor".

While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email id, etc. are required to be provided.

f) The complainant may use SCORES 2.0 portal to submit the complaint or grievance directly to the Company under the category "Listed Company- Debt Issue (Interest / Redemption / Transfer / Transmission etc.)" and selecting "A. K. Capital Finance Limited".

g) In order to enhance ease, speed and accuracy in the redressal of grievance, the complaint shall be lodged on SCORES 2.0 within one year from the date of cause of action, where the Complainant approached the Company for redressal of the complaint and the Company rejected the complaint or the complainant has not received any reply from the Company or the complainant is not satisfied with the reply received or the redressal by the Company.

h) The investor may contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on SCORES 2.0 portal. The list of IAs is available on SEBI website (www.sebi.gov.in) *(Path – Home » Intermediaries/ Market Infrastructure Institutions » Recognised Intermediaries » Recognised Investors Associations)*. Investors may also seek assistance in filing complaints on SCORES 2.0 portal from SEBIs toll free helpline number 1800 266 7575.

i) The investor may also approach and submit the grievance/ complaint to the Registrar & Transfer Agent and Debenture Trustee & Security Trustee of the Company. Below given contact details:

REGISTRAR & SHARE TRANSFER AGENT

Name - MUFG Intime India Private Limited (formerly known as Link Intime India Private Limited)
Address - C 101 247 Park, L B S Marg,
Vikhroli West Mumbai 400 083
Contact Person - Mr. Ganesh Jadhav
Tel. - +91 22 49186000
Fax - +91 22 49186060
Email - ganesh.jadhav@ in.mpms.mufg.com
Website - https://in.mpms.mufg.com/

DEBENTURE TRUSTEE & SECURITY TRUSTEE

Name - Catalyst Trusteeship Limited,
Address - Unit No.-901, 9th Floor, Tower-B,
Peninsula Business Park, Senapati Bapat Marg,
Lower Parel (W), Mumbai – 400 013
Contact Person - Ms. Priti Shetty
Tel - +91 022-49220555
Fax - +91 22 4922 0505
Email - ComplianceCTL-Mumbai@ctltrustee.com
Website - https://www.catalysttrustee.com

j) The Investor Grievance Redressal Officer gathers all information available on the grievance/ complaint which are considered necessary for a proper investigation. He looks into all the necessary information and undertakes to resolve them as soon as possible.

k) To enhance investor satisfaction on complaint redressal, 'First & Second Review' is also available under online resolution mechanism, wherein a complainant, if not satisfied with the redressal of grievance by the Company & opts for review within 15 calendar days from the receipt of Action Taken Report ("**ATR**") from the Company/ Designated body or there is no response from the Company/ Designated body within the stipulated timeline.

l) For any failure to redress investor grievances received through SCORES 2.0 and remains pending beyond 60 days by the Company, appropriate actions as specified in **"Annexure III"** shall be taken.

m) The Board of the Company shall review the status of the grievances/ complaints on a quarterly basis.

5) Resolution mechanism for offline complaints:

Any investor wishes to report any grievance/ complaint shall submit the same on the below given email ids in the prescribed format as specified in "Annexure IV"

a) In case of any complaint/ grievance, the Investors can write to:

Investor Grievance Redressal Officer
601-602, 6th Floor, Windsor, Off CST Road, Kalina,
Santacruz (E), Mumbai – 400 098
Phone No.: 022-67546500
Email Id: csakcfl@akgroup.co.in

b) If not satisfied with the response of the Investor Grievance Redressal Officer, the Investors can write to:

Mr. A. K. Mittal,
Managing Director
601-602, 6th Floor, Windsor, Off CST Road, Kalina,
Santacruz (E), Mumbai – 400 098
Phone No.: 022-67546546
Email Id: ncd_akcf@akgroup.co.in

The Company shall provide the resolution within 21 calendar days from the receipt of complaint/ grievance from the investor.

6) Resolution mechanism for online complaints through SCORES:

a) In case Investors do not receive a resolution within 21 calendar days from the date of submission of the complaint or not satisfied with the resolution or wish to submit an online complaint, they can submit the compliant/ grievance through the SCORES 2.0 portal at https://scores.sebi.gov.in/

b) Complaint shall be auto forwarded to the Company through SCORES 2.0. The Company shall resolve the Complaint and upload the ATR on SCORES 2.0 within 21 calendar days of receipt of the Complaint. The ATR uploaded by the Company will be automatically routed to the complainant.

c) The given complaint shall be simultaneously forwarded to Designated Body, i.e., Stock Exchange. The Designated Body to ensure that the Company shall submit the ATRs with the stipulated timeline.

d) First review

In case the Company has not submitted the ATR within the stipulated time of 21 calendar days

Or

If the complainant is not satisfied with the resolution provided and makes a request for a review of the resolution provided by the Company within 15 calendar days from the date of submission of ATR

Then, the concerned Designated Body shall take cognizance of the Complaint for first review of the resolution through SCORES 2.0 and the Company shall submit the ATR within the allowed timeline. The Designated Body shall submit the revised ATR to the complainant on SCORES 2.0 within 10 calendar days of the review sought.

e) Second review

In case the Designated Body has not submitted the ATR within the stipulated time of 10 calendar days

Or

If the complainant is not satisfied with the resolution provided and make a request for a review of the resolution provided by the Company within 15 calendar days from the date of submission of ATR

Then, SEBI may take up the review with stakeholders involved, including the Company or/and Designated Body. The Company or/ and Designated Body shall take immediate action on receipt of second review complaint from SEBI and submit revised ATR to SEBI through SCORES 2.0, within the timeline specified by SEBI.

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.

7) Initiation of the dispute resolution process through the Online Dispute Resolution ("ODR") portal

After exhausting the options for resolution of the grievance as mentioned in the above paragraphs, if the investor is still not satisfied with the outcome or 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 parties, he/she/they can initiate dispute resolution through the ODR Portal.

The dispute resolution through the ODR Portal cannot be initiated when the complaint/dispute:

a) is under consideration in terms of the paragraph 5 or paragraph 6 above;
b) is under consideration as per SCORES 2.0 guidelines;
c) is pending before any arbitral process, court, tribunal or consumer forum;
d) is 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);
e) is against the Government of India / President of India or a State Government / Governor of a State.

In case the Client opts for Online Dispute Resolution mechanism or other appropriate civil remedies while the complaint is pending on SCORES 2.0 portal, the pending complaint shall be treated as disposed on SCORES 2.0.

8) Stakeholders Relationship Committee:

The Committee of the Board monitors the investor grievances and implements processes for facilitating smooth investor experience. A report about the complaints/ grievances covering complaints received, resolved and outstanding as at the end of the quarter shall be placed before the said Committee for deliberation. In case of any delay in resolution process, the same shall be brought to the notice of the Committee on immediate basis.

9) Review and Amendment:

The Company shall reserve the rights to review and make amendment to the Policy from time to time as it deems fit in accordance with the applicable laws, rules and regulations for the time being in force. In the event of any conflict between the provisions of this Policy and the Act or Regulations or Rules or any other statutory enactments, the provisions of such Act or Regulations or Rules or statutory enactments shall prevail over this Policy. An interim review and amendment can also be carried out to accommodate minor changes, if any, on regulatory and operating front by the Compliance Officer of the Company.

Important links:

SEBI SCORES 2.0	https://scores.sebi.gov.in/scores-home
SMART ODR	https://smartodr.in/login

Annexure I - "Nature of Complaints"

1. Non updation of address /Signature or Corrections etc
2. Non-receipt of Bonus
3. Non receipt of Dividend
4. Non receipt duplicate debt securities certificate
5. Non-receipt of duplicate share certificate
6. Non receipt of fractional entitlement
7. Non receipt of interest for delay in dividend
8. Non receipt of interest for delay in payment of interest on debt security
9. Non receipt of interest for delay in redemption proceeds of debt security
10. Non receipt of interest for delay in refunds
11. Non receipt of interest on securities
12. Non receipt of redemption amount of debt securities
13. Non receipt of refund in Public/ Rights issue
14. Non receipt of Rights Issue form
15. Non receipt of securities after conversion/ endorsement/ consolidation/ splitting
16. Non receipt of securities after transfer
17. Non receipt of securities in public/ rights issue
18. Non receipt of shares after conversion/ endorsement/ consolidation/ splitting
19. Non receipt of shares after transfer
20. Non receipt of shares after transmission
21. Non receipt of shares in public/ rights issue (including allotment letter)
22. Non-receipt of interest for delay in dispatch/credit of securities
23. Receipt of refund/ dividend in physical mode instead of electronic mode
24. Receipt of shares in physical mode instead of electronic mode
25. Demat/ Remat
26. Complaints of any other nature as may be notified under applicable regulations from time to time

Annexure II - "Online Redressal Mechanism"



Annexure III - "Actions in case of non-compliances"

Sr. No.	Activity	No of calendar days
1.	Complaint handling:	
a.	Complaint received in SCORES 2.0 by the listed company	T
2.	Action in case of non-compliances:	
a.	Notice to Listed company intimating the fine @ INR 1000/- per day, per complaint to be levied for not resolving the complaints within 60 days	T+61
b.	Notice to Promoters for non-resolution of complaints and non-payment of fine to the stock exchange.	T+76
c.	Freezing of promoters shareholdings (i.e. entire shareholding of the promoter(s) in listed company as well as all other securities held in the demat account of the promoter(s)) in demat account.	T+86
d.	Stock exchanges may take any other actions, as deemed appropriate.	
e.	Once Stock exchange has exhausted all options and yet the number of pending complaints exceed 20 or the value involved is more than INR 10 lakhs, the Exchange to forward the details of such Listed companies to SEBI for further action, if any	

Annexure IV - "Complaint/ Grievance Form"

Name of the Investor/ Complainant	
Permanent Account Number ("PAN")	
DP & Client ID/ Folio Number	
Communication address	
Mobile Number	
Email Address	
ISIN of the Securities	
Details about the complaint/ grievance	
Attachments, if any	

Note:

1. ***All the fields are mandatory, until specified otherwise***
2. ***The Company shall promptly respond to the investor/ complainant confirming the receipt of grievance/ compliant***

PART B – Investor Grievance Redressal Mechanism as per Digital Personal Data Protection Act, 2023

1) Introduction:

This Mechanism is framed in accordance with the provisions of the Digital Personal Data Protection Act, 2023 ("**DPDP Act**") read with Digital Personal Data Protection Rules, 2025 ("**DPDP Rules**") and is intended to establish a transparent, efficient and time-bound mechanism for addressing grievances raised by Data Principals with respect to the processing of their Personal Data as received by the Company .

A. K. Capital Finance Limited ("**Company**") in its capacity as Data Fiduciary is committed to process personal data in a lawful, fair, transparent and secure manner while respecting the rights of Data Principals in accordance with applicable provisions of Section 13 of the DPDP Act.

2) Applicability and Objective:

This Mechanism applies to grievances relating to Personal Data processed by the Company.

The DPDP Act mandates the Company in its position as a Data Fiduciary obtaining and processing Personal Data to establish an effective mechanism to redress the grievances of individual to whom the Personal Data relates.

3) Definitions:

a. **"*Complainants*"** shall mean all clients, investors, customers, borrowers, guarantors, employees, vendors, and other Data Principals whose Personal Data for the purpose of processing is obtained by the Company, raises Complaint(s) / Grievance(s) under this mechanism.

b. **"*Complaint or Grievance*"** A Complaint or Grievance means any expression of dissatisfaction made by a Data Principal/ Complainants in respect of any act or omission by the Company in relation to the processing of Personal Data or the exercise of rights available to Data Principal under the provisions of the Act and rules made thereunder.

c. **"*Data Fiduciary*"** means any person who alone or in conjunction with other persons determines the purpose and means of processing of Personal Data.

d. **"*Data Principal*"** means the individual to whom the personal data relates and where such individual is—
(i) a child, includes the parents or lawful guardian of such a child;
(ii) a person with disability, includes her lawful guardian, acting on her behalf;

e. "***Investor***" includes any investor in the securities of the Company as well as potential investor who has applied/ submitted application for subscribing the securities issued by the Company.

f. **"*Personal data*"** means any data about an individual who is identifiable by or in relation to such data.

Any term(s) and, or expression(s) not defined in this Mechanism shall have the same meaning as defined in the applicable provisions of the DPDP Act read with DPDP Rules.

Wherever appropriate in this Mechanism, a singular term shall be construed to mean the plural where necessary and a plural term the singular. Similarly, any masculine term shall also be construed to mean the feminine or any other gender and vice versa.

4) Rights of Data Principal:

Data Principal shall have the right to access, correct or update any inaccuracies in their personal data, request erasure or deletion, where legally permissible, withdraw their consent (without affecting lawful prior processing), and nominate another person to exercise their rights.

5) Grievance Redressal Officer:

The Company has designated Compliance Officer of the Company as Grievance Redressal Officer with below co-ordinates to address such Complaints / Grievances as defined under this Mechanism. :

Email Address	csakcfl@akgroup.co.in
Address	601-602, 6th Floor, Windsor, Off CST Road, Kalina, Santacruz (E), Mumbai – 400 098

Complaint or Grievance can be lodged by submitting a duly filled 'Grievance Form' in the format set-out in "Annexure-I" hereto, and forwarding the same to the Grievance Redressal Officer on the contact details given above.

6) Grievance Resolution Process

(i) The Grievance Redressal Officer/ Data Protection Officer shall examine the Grievance and may seek additional information or clarification from the Data Principal, wherever required.

(ii) In case the resolution of Complaint requires inputs/ responses from any other department(s) of the Company the Compliance Officer shall share the details of the Complaint received and seek the necessary inputs/ responses from the concerned department(s).

(iii) The Grievance Redressal Officer shall review and provide the optimal resolution representing the Company's best attempt to address the Grievance within a period of 90 days from the date of its receipt.

(iv) Resolution may include corrective action in the form of clarification, providing access, correction and/or erasure of incorrect data, or other appropriate remedial measures.

(v) In accordance with Section 13(3) of the DPDP Act, the Data Principal shall exhaust the grievance redressal mechanism provided by the Company before approaching the Data Protection Board of India.

(vi) If the Data Principal is not satisfied with the resolution or no response is received within the prescribed time, he/ she may escalate the grievance to the Data Protection Board of India in the manner provided under the DPDP Act.

7) Review and Amendment:

The Board may amend this Mechanism as and when deemed fit. This Mechanism shall subject to review by the Board at least on an annual basis.

The Company shall reserve the rights to review and make amendment to the Mechanism from time to time as it deems fit in accordance with the applicable laws, rules, acts and regulations for the time being in force. In the event of any conflict between the provisions of this Mechanism and the DPDP Act or DPDP Rules or any other statutory enactments, the provisions of DPDP Act or DPDP Rules or statutory enactments shall prevail over this Mechanism. An interim review and amendment can also be carried out to accommodate minor changes, if any, on regulatory and operating front by the Compliance Officer of the Company.

Annexure I - "Complaint/ Grievance Form under DPDP Act"

Name of the Data Principal	
Permanent Account Number ("PAN")	
Communication address	
Mobile Number	
Email Address	
Details about the Complaint/ Grievance	
Type of request (access, correction, erasure, etc.)	
Attachments, if any	

Note:

1. ***All the fields are mandatory, until specified otherwise***
2. ***The Company shall promptly respond to the Complainant confirming the receipt of Grievance/ Compliant***