BUILDING BONDS

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A. K. CAPITAL SERVICES LIMITED

BUILDING BONDS

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INVESTOR GRIEVANCE REDRESSAL POLICY

1. INTRODUCTION:

A. K. Capital Services Limited ("AKCSL" 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:

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

2. DEFINITIONS:

a) **Investor**: shall 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 AKCSL 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 A. K. Capital 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 AKCSL 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/ Customer**: shall mean client/ customer of A. K. Capital 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.

3. GUIDING PRINCIPLES:

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

4. RESOLUTION PROCESS:

It may be noted that only the grievances received in written form will be considered under the grievance redressal mechanism. The Investor (including potential investor)/ Customer shall address the complaint in the manner provided in "**Annexure I**" to this Policy.

The Compliance Officer is designated as Grievance Redressal Officer under this Policy.

Appropriate resolution or response shall be provided as soon as possible depending upon the nature of the complaint or concern. Notwithstanding anything to the contrary contained herein, the Company shall comply with the grievance redressal mechanism and process as prescribed under SEBI Circular dated September 20, 2023 on the redressal of investor grievances through the SEBI Complaints Redressal (SCORES) Platform and linking it to Online Dispute Resolution platform ("SEBI Grievance Redressal circular").

The Company shall adhere to the norms, process, procedure, checklist and registers as may be specified by SEBI from time to time, including compliance of SEBI Circular SEBI/HO/DDHS/P/CIR/2021/613 dated April 13, 2022 in connection with the Publishing Investor Charter and Disclosure of Complaints by Merchant Bankers on their Websites - Debt Market.

5. CHANGES TO POLICY:

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.

Annexure I

Resolution Process:

a) Complaints can be lodged by submitting a duly filled 'Investor Grievance Redressal Form' in the format set-out in "**Schedule A**" hereto, and forwarding the same to the Grievance Redressal Officer, whose details are mentioned below:

Grievance Redressal Officer: Ms. Chaitali Desai
Email: investor.grievance@akgroup.co.in
Phone No.: 022-6754 6500
Address: 603, 6th Floor, Windsor, Off CST Road, Kalina, Santacruz (East), Mumbai - 400 098

b) If the Investor is not satisfied by the resolution/response provided or has not received any resolution/ response from the Grievance Redressal Officer within 10 calendar days after filing the in compliant/ required information, the investor may escalate the matter to the Whole Time Director, whose details are mentioned below:

Whole Time Director: Mr. Ashish Agarwal
Escalation Email: ashish.agarwal@akgroup.co.in
Phone No.: 022-6754 6500
Address: 603, 6th Floor, Windsor, Off CST Road, Kalina, Santacruz (East), Mumbai - 400 098

In all cases, AKCSL shall endeavor to resolve or respond to the complaint with the requisite information within 21 calendar days from the date of complaint.

c) 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.

d) 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.

e) 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 A. K. Capital Services Limited under the 'Merchant Bankers' category.

f) 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.

g) 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.

h) In case the Investor is not satisfied with the resolution provided after the review process stated in point (g) 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.

i) 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 mechanism in securities market. In addition, the Investor has the option to approach legal forums including civil courts, consumer courts etc.

j) 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.

k) 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.

Important links:

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

Schedule A

INVESTOR GRIEVANCE FORM

☐ **Investor - Individual**	☐ **Investor - Non-Individual**	☐ **Other**

PERSONAL DETAILS:

*Name:

*PAN:

CONTACT DETAILS:

*Address:

*Landline/Mobile: *Email ID:

ISSUE DETAILS

*Name of the Issuer Company:

*Issue Opening Date:

*Security Name with Series:

STATE YOUR GRIEVANCE

1000 words

**** Mandatory Fields***

I, the complainant, do hereby acknowledge that all the information provided in this complaint form are true to my knowledge, belief and understanding and no part of it, intentionally or otherwise, has been concealed and/or misrepresented thereof.

[*End of the Form*]