

CENTRUM CAPITAL LIMITED

Investor Grievance Redressal Policy

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1. OBJECTIVE

Providing excellent service on a regular and consistent basis is very important for the organisation's sustained growth. Centrum Capital Limited ("CCL") 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:

- **Investors:** 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 CCL in its capacity as a Merchant Banker
- **Complaint or grievance:** is "An expression of dissatisfaction made by the Investor related to the services of CCL and/or its Client (in respect of the services rendered by CCL including in respect of any of the transaction undertaken by CCL in its capacity as a Merchant Banker". This however needs to be differentiated from matters like from general feedback, enquiry before the due date.
- **Client/ Customer:** shall mean client/ customer of CCL
- **Redressal:** can be defined as a process or action resulting in giving solution to the problem faced by an Investor

2. GUIDING PRINCIPLES

1. **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.
2. **Accessibility:** The Company will enable the Investors to communicate their complaints/issues and avail redressal services through multiple channels.
3. **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.

3. GRIEVANCE REDRESSAL POLICY

Registration of Complaints

The various channels available to Investors for registering the complaints are as follows:

- **SEBI Complaints Redress System (SCORES):** SEBI maintains SCORES which is a web based centralized grievance redressal system of SEBI. Investors can lodge their grievances/complaints through the SCORES link available on the SEBI website. SCORES enables investors to lodge and follow up their complaints and track the status of redressal of such complaints online from the above website from anywhere. Investors can also lodge grievances/complaints in physical form at any of the offices of SEBI. Such grievances complaints would be scanned and uploaded in SCORES for processing.
- **E-Mail or Fax:** Investors can log their complaint or escalate the investor grievance to an email id titled igmbd@centrum.co.in
- **Grievance Redressal Officer:** Investors can contact the Compliance Officer for redressal of issues.

4. RESOLUTION OF COMPLAINTS

Responsibility

- Primary responsibility is with the Compliance Officer to resolve the complaint for which he would liaise with the other relevant departments (like Merchant Banking Team, Operations, Accounts, Legal, Compliance etc).
- If the issue cannot be resolved by the Compliance Officer, the same will be escalated to the Senior Management
- All complaints received shall be recorded internally including how the same has been resolved

Time for Response

General Turn Around Time (TAT) for response to complaint is (from the receipt of the valid complaint in writing):

- Allotment/ Refund related – 10 working days
- Legal notices – 30 working days
- Cases involving third party- 30 working days
- Fraud related – 45 working days
- All other cases- 30 working days
- SCORES related- as specified by the regulator from time to time

Note: The above TAT can change depending upon the nature and complexity of complaint.

Escalation of Complaints

If an investor is not satisfied with the resolution provided through various channels or the method of handling complaint; the investor can escalate the issues to the next higher level i.e. to the Managing Director of the Company. Such escalation should be made in writing and should be delivered in the hard copy to the Corporate Office of the Company at:

8th Floor, Centrum House, CST Road,
Kalina, Santacruz (East), Mumbai 400098