

Investor Grievances Resolution Policy

Motilal Oswal Financial Services Ltd. (MOFSL) - For following Businesses:

- Trading cum Clearing Member of Exchanges
- Depository Participant
- Research Analyst
- Corporate Agent
- Mutual Fund Distribution
- Portfolio Management Services Distribution

Version Details

| Sr. No. | Details of Changes | Date of creation / Change | Author | Version Number | Approved By |
|---------|---|---------------------------------|---|----------------|--------------------------------------|
| 1 | 1st consolidated Investor Grievances Resolution Policy | 1st November 2016 | Mr. Neeraj Agarwal / Ms. Kusum Patel | Ver. 1.1 | Mr. Ajay Menon/ Mr. Motilal Oswal |
| 2 | Changes pursuant to SEBI circular dated 10 th March 2017 | 15 th March 2017 | Mr. Neeraj Agarwal / Ms. Kusum Patel | Ver. 1.2 | Mr. Ajay Menon/ Mr. Motilal Oswal |
| 3. | Change pursuant to SEBI Circular dated 26 th March 2018 | 10 th April 2018 | Mr. Neeraj Agarwal / Ms. Kusum Patel | Ver. 1.3 | Mr. Ajay Menon/ Mr. Motilal Oswal |
| 4 | IG Policy after merger of MOSL with MOFSL | 21 st Aug, 2018 | Mr. Neeraj Agarwal / Ms. Kusum Patel | Ver. 1.4 | Mr. Ajay Menon/ Mr. Motilal Oswal |
| 5 | Review of Policy | 30 th September 2019 | Mr. Neeraj Agarwal / Ms. Kusum Patel | Ver. 1.5 | Mr. Ajay Menon/ Mr. Motilal Oswal |
| 6 | Review of Policy | 20 th October, 2020 | Mr. Neeraj Agarwal / Ms. Kusum Patel | Ver. 1.6 | Mr. Ajay Menon/ Mr. Motilal Oswal |

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| 7 | Review of Policy | 25 th September, 2021 | Mr. Neeraj Agarwal / Ms. Kusum Patel | Ver. 1.7 | Mr. Ajay Menon/ Mr. Motilal Oswal |
| 8 | Updation of Business of MOFSL & cancellation of PIMPL License. | 15 th June 2022 | Mr. Neeraj Agarwal / Ms. Kusum Patel | Ver. 1.8 | Mr. Ajay Menon/ Mr. Motilal Oswal |
| 9 | Revision in TAT by SEBI | 30 th August 2023 | Mr. Neeraj Agarwal / Ms. Kusum Patel | Ver. 1.9 | Mr. Ajay Menon/ Mr. Motilal Oswal |
| 10 | Review of Policy | 20 th November 2024 | Mr. Neeraj Agarwal / Ms. Kusum Patel | Ver. 1.10 | Mr. Ajay Menon/ Mr. Motilal Oswal |

Issued by: Compliance Department

Review of Policy

We review the policy periodically. Hence, review page is updated as below:

Review details:

| Sr. | Details of Review | Date of Review | Reviewer 1 | Reviewer 2 |
|-----|--------------------------|--------------------------------|---|--------------------|
| 1 | Periodical Policy Review | 30th September 2019 | Ms. Kusum Patel | Mr. Neeraj Agarwal |
| 2 | Periodical Policy Review | 20th October, 2020 | Ms. Kusum Patel | Mr. Neeraj Agarwal |
| 3 | Periodical Policy Review | 25th September, 2021 | Ms. Kusum Patel | Mr. Neeraj Agarwal |
| 4 | Periodical Policy Review | 21 st October, 2022 | Board of Directors | |
| 5 | Periodical Policy Review | 20th November, 2024 | Ms. Kusum Patel | Mr. Neeraj Agarwal |
| 6 | Periodical Policy Review | 25 th April, 2025 | Mr. Neeraj Agarwal / Ms. Kusum Patel | Board of Directors |

Investor Grievance Resolution Policy

Objective: To set guidelines for handling & addressing Investor Grievances effectively and timely, ensuring better customer experience.

Scope: All complaints received from end-client, directly or indirectly and from Regulators for stock broking/commodity broking and depository operations.

Applicability: This policy shall be applicable to Motilal Oswal Financial Services Limited and will be referred as “MOFSL” in policy

It is essential that grievances of the clients are given due importance and quick action is taken to resolve the same. To provide efficient and enhanced services to the client, MOFSL has a mechanism in place to address the grievances of its clients relating to any business or service / trade related issues made directly or through the Exchange(s)/ other authorities including settlement by arbitration.

MOFSL has designated exclusive email-ids for enabling clients to lodge their complaints relating to equity, derivatives or other securities/commodities and other licenses. Please find below details of grievances email Ids.

| Company | Email Id |
|--|--|
| Motilal Oswal Financial Services Limited | grievances@motilaloswal.com , dpgrievances@motilaloswal.com |

These e-mail Ids have been informed to the clients through website, account opening document, Notice Boards displayed at locations of HO, Authorized persons, branches and daily / monthly statements sent to clients such as Ledgers, DP statements, Contract notes, Balance confirmation, quarterly statements etc.

The client can also mail to respective CSE Head/Compliance Officer's / CEO's email Ids. The escalation matrix i.e. contacts details where client can raise his concerns is given below.

| Details of | Contact No. | Email Id |
|-----------------------|----------------|--|
| Customer care | 022 - 40548000 | query@motilaloswal.com |
| Head of Customer care | 022-40548082 | servicehead@motilaloswal.com |
| Compliance Officer | 022-71881085 | na@motilaloswal.com |
| CEO | 022-40548083 | am@motilaloswal.com |

The Escalation matrix is already available on MOFSL corporate website.

As per regulatory requirements, we have created email id ig@motilaloswal.com for MOFSL for receiving and responding grievances received from Exchanges / Regulators.

We, hereby, exemplify the following process and guidelines for proper and responsible handling of all complaints for efficient and effective complaints resolution.

1. **Receipt of complaint**

MOFSL can receive client complaint either directly from client or through its associated authorized persons and branches in any of the modes viz: physical letters, fax, e-mail, phone and personal visit. Further, clients' complaints are also received through Regulatory authorities, Exchanges, SCORES Login, Advocates, Consumer forums etc.

Associated authorized persons and branches are required to forward client complaint received by them to Head Office. A circular informing the same to the authorized persons and branches has been issued through internal software. An online system has been developed for Authorized Persons & branches for their ready reference where they can view the complaint details of their associated clients received at HO and its status.

All complaints received through various sources and relevant details of complaint is captured in the online centralized System i.e. Centralized Complaint Register (referred as CCR hereinafter) of the

respective company. Records should be maintained in such a manner so as to enable the designated official(s) to understand and investigate the cause of complaint. This CCR is a comprehensive system from which all the complaints of the company can be ascertained and the details of the same can be accessed. This, apart from other benefits, helps avoid any duplication on reply and rework on the same complaint.

2. Recording of Complaint details in CCR

The details of complaint should be registered on the same date of receipt.

a) Received in E-mail form

Client complaint received directly or through its Authorized Persons and branches in E-mail form at any of the designated email ids mentioned above are duly acknowledged by recording the details in our System and the sender is issued an 'interaction ID' as a confirmation of receipt of his specific complaint which can also be used for all correspondences thereon. This 'interaction ID' is informed to client with a return mail to the same email ID from where the complaint is received. The complaint is assigned to the Grievances Department which will resolve the same. The official of grievance team shall ensure that the complaint is recorded in the CCR of the company. Upon receipt of complaint all the correspondence with client will happen only through grievance email ids.

The complaints if received on any other email id should be forwarded to Grievances team, separately, for resolution. CCR should be suitably accessible to all concerned employees of the Grievances team of the company where the complaints forwarded by CSE are also recorded in CCR. It is the responsibility of Grievances team to record all the complaints in respective CCR of the company for future audit purpose and no single complaint should be missed out.

b) Received through Regulators etc.

client complaints received via email from Regulators or from their web portals or SCORES Login are recorded in CCR. SEBI vide its circular no. SEBI/HO/OIAE/OIAE_IAD- 1/P/CIR/2023/131 dated 31st July 2023, had introduced the Online Dispute Resolution (ODR) portal wherein if client is not satisfied with SCORES portal may file his dispute with ODR portal and the same will be referred to ODR Institution for conciliation and all such complaints/conciliation will be recorded in CCR. Client's complaints received through Regulatory authorities in physical letters are stamped by Grievances Team and the same is recorded in the CCR of the company.

c) Received directly as physical letters, fax, Hand delivery, phone etc.

Further, complaints received in any above form are handed over to the Grievance team and are recorded in the CCR by the designated grievance team.

Any physical letter received by the Department is duly stamped with receiver's signature, and date of receipt. The receiver should be any official of grievance team who will ensure resolution of the complaint. Further physical complaints are scanned and system interaction is created for immediate access during any point of time and easy retrieval in future.

d) Received at Authorized Person / Branch Office

As a process, as and when a complaint is received either in hard copy or via e-mail, the Authorized Persons / branch should immediately forward the same to above mentioned grievances ids of the respective company. Further, in case of hard copy the original should be forwarded to Head Office where the same shall be entered in the CCR by grievance Team. A copy of the hard copy should be kept with, Authorized Persons /branch for records and future reference.

e) Received by Employees at their company email ID

If any client sends a complaint through e-mail to any Employee of the company, they should forward such mails to respective grievances email ids depending on the matter of the complaint for recording in CCR and for immediate resolution. All employees are aware of the said process as the same is made available in compliance policies on internal web login.

3. Handling / Resolution of client complaint

It is the responsibility of the Grievance team to carefully handle complaints received at their desk. Complaints received from the clients should be properly classified into complaints and queries.

Designated officials in Grievance department study the complaint received and after investigation of the complaint, draft reply to the client.

Verifications: Every complaint should be compulsorily verified for facts and feedback, with the concerned authorized person / branch wherever applicable. This is important as authorized person will become aware of complaint lodged against them and will ensure that hidden facts of the case are brought to the notice of the person investigating the case. Hence, Investigator shall be in a better position for resolving the case. Cases where only HO is concerned should be verified with the concerned departments. Wherever possible verification calls and other investigation should be recorded.

Investigation: Investigation shall involve verifying case facts with client's KYC/MCA, ledger, sauda summary, DP statement, collateral account, Elogs, SMS Logs, PODs, Surveillance Calling, recordings, warehouse receipts etc. (as the case may require)

Investigation, being a vital step in the process of resolution, should be available for future audit. Thus, authorized person / branch feedback should be obtained in writing (physical/email form).

Reply: After complete investigation, verification and considering the feedback of authorized person/branch, the detailed reply should be given to client based on the facts analyzed.

Complaints received directly to grievances email ids should be replied to client from respective grievances id. Complaints received from regulators through email, web portal, SCORES Login or ODR portal should be replied through response uploaded to respective portal and the same may be replied through Email as well as the case may be.

However, where it is felt that complaint is not tenable, the client is accordingly provided with clarification for the same.

It may be noted that before sending any reply, the complaint register should be referred to ensure that any history of the complainant is taken note of. Also, it should be taken care that no confidential information like password detail, account records or any confidential information etc. are provided in replying to unregistered ID of client. Also, it should be ensured that any reply to unregistered email Id is also sent to the complainant client's registered e-mail ID.

In order to ascertain the facts of the case, designated official(s) may seek clarification from the client, authorized person, branches, Regulatory authorities, internal departments etc. On verification, if he is satisfied that the complaint is justified then after obtaining prior approval from the HOD, the matter is settled amicably and a letter is obtained w.r.t withdrawal / settlement of complaint. The approval (of settlement amount) has to be as per the empowerment matrix as applicable from time to time.

SEBI vide its gazette notification dated 16th August 2023, has state that the Investor Grievances should get redressed within 21 calendar Day.

Closure of complaint: Whenever the reply is sent to client and client does not revert back in 21 days from the date of reply, we treat the final reply date as close date. If the client reverts back after 21 days from the date of final reply then the said complaint is treated as new complaint.

If the client reverts back within 21 days of our reply then the complaint is not closed and is treated as same complaint. Hence in the said process actual resolution may cross 21 days on account of such to and fro communication with client.

Further if client raises another complaint having different issue anytime then the complaint is treated as a new complaint.

4. Maintenance of records

The complaint register is maintained for such period as is laid down by the Regulatory authorities. However, the electronic data is archived on regular interval (quarterly/ half yearly) which can at any time be retrieved for accessing any data.

Further, complaints received in hard copy should be appropriately filed and database of the same should be maintained for convenient retrieval.

5. Tracking of pending / unresolved complaint

Turn Around Time (TAT) should be strictly adhered to. TAT is the time taken in terms of working days, to reply to a complaint, appropriately.

For letters received through Regulatory authorities (SEBI/Exchanges/SCORES/depositories), TAT is the date for reply as indicated by the Regulator in their letter, unless an extension is sought.

For Insurance related complaints, As per Reg. 14 (iv) of IRDAI (Registration of Corporate Agents) Regulations, 2015 a corporate agent has to take adequate steps for redressal of grievances of its clients within 14 days of receipt of such complaints.

For all other sources of complaints received, TAT is T+7 (T = date of Receipt of Complaint; +7 = additional seven working days). In case the reply remains pending on the expiry of TAT, the same should be escalated to the HOD / concerned business / regional heads for their action. Also, an interim reply informing about the status of complaint and informing more time is needed to resolve the matter should be sent to the client.

HODs of the respective resolution team should monitor the pending/unresolved complaints as per their TAT and review the same on regular intervals for faster resolution of complaints and ongoing improvement in service levels.

Generally complainants should be responded within prescribed TAT but reply may be delayed on account of various reasons. Some of the reasons are mentioned below:

- Incomplete complaint
- Client is not available for understanding / discussion of complaint
- Retrieval of data such as welcome letters, statements, PODs, voice recordings, SMS / Elogs, takes time incase alleged period of complainant is old or a very large period such as more than a year. Analysis / investigation of case take long time if the alleged period of complainant is old or a very large period such as more than a year.
- Delay in receipt of satisfactory reply from the Branch / Authorized Person
- Non receipt of information/ documents sought by the company from the client etc.
- In cases where the company or its Authorized Person are settling the matter, more time is required for negotiation and discussion of settlement terms.

In spite of above limitations Grievances team should put their best efforts to resolve the complaints to the satisfaction of the customer within appropriate time. As per **SEBI's gazette notification dated 16th August 2023**, MOFSL is required to resolve the grievances of investors within 21 days of receipts of complaint from client.

6. Root cause analysis of complaints

Cause of complaints should be analyzed on a periodic basis and in case deficiency in any process is discovered then steps should be taken to review the process and to ensure adherence to revised process/rules to mitigate the cause of complaint.

Analysis should also be done based on the maximum number of complaints received in terms of their nature, concentration of complaints if any with respect to particular Branch / Authorized Person, etc. Based on analysis and on the judgment of the HOD, Show Cause Notice (SCN) should be issued to Authorized Person / Branch. Warning / Caution may also be issued if the complaint resolution team finds some suspicious activity at Authorized Person / Branch end.

The cause analysis should be documented as it is an inevitable step towards improving our system and process for complaint handling, In fact, the best time of observation is while solving a complaint. This also helps in the periodic activity of Root cause analysis.

7. Proactive Action for Improvement and Prevention

- If the client alleges for the discretionary trades done in his account, the respective account may be suspended temporarily with consent of/intimation to client for the same so as to avoid any further disputed trading irrespective of the genuineness of the client's claim. Suspension of account is carried out in such a manner that the clients outstanding position if any is not put to risks i.e. client is allowed to square off or carry forward his derivative contracts or deal in delivery basis of its open position or can take away his eligible fund / securities payout if any.
- If the complaints of unauthorized trades is received from more than 5% of active clients of particular branch / Authorized Person subject to minimum 3 complaints in a month's time, the company should send balance to its major clients (depending on turnover of the clients) mapped under that Authorized Person / Branch as a cautious approach. The decision of sending such balance confirmations to its clients will be based on the gravity of the complaint / pattern of complaints received and based on the investigations and facts of the matter.

8. Actions and Penal Measures on Employee / Authorized Person:

- In case of complaints received from customers directly by HO, the concerned Authorized Persons / Branch have to provide reply to grievance team within three days of receipt of complaint by them. In case of inordinate delay / unsatisfactory or no feedback / cooperation from Authorized person/ Branch after receipt of complaint, penalty of Rs. 5,000 will be debited to accounts maintained with the company.
- Additionally any penalty levied by Exchanges for delay in resolution of customer complaint will be recovered from respective Authorized Person / Branch.
- Upon receipt of direction of IGRC / IGRP / Conciliation for blockage of deposit for trade related disputes upon admissibility of claim by them, necessary action will be initiated by the company such as blocking of deposit of Authorized Person, debiting the Account statement of Authorized Person to the tune of claim amount and further proceedings thereupon will be carried out as per the provisions of SEBI circular issued on Investor Grievance Redressal Mechanism. Also in case where employees of the company are involved, such Admissible amount may be recovered from their salary account upon their HODs approval.
- Any direction of IGRC / IGRP / Conciliation such as rendering of any specific service should be immediately complied with.

- ODR conciliation charges will be recovered from Branch P&L or from respective Authorised Person as the case may be.
- Penalty levied by Exchange towards Unauthorised trades will be recovered from Branch P&L or from respective Authorised Person as the case may be.
- When a case is settled and the Authorized person or their employee/ Branch/ of the company is found to be responsible for the loss, the same may be recovered from concerned Authorized person/ Branch by debiting the settled amount in Authorized person's / Branch accounts maintained with the company. Also in case of employees of the company such settled amount may be recovered from their salary account upon their HODs approval.
- In case any Authorized person/ any Employee of the organization is found to have indulged in wrong practices such as manipulation, discretionary trades etc. or have not rendered proper services, stringent / disciplinary actions may be initiated against them such as issuance of caution, warnings, imposition of monetary fine, termination of business / termination proceedings against employees etc. on case to case basis depending upon gravity of the matter and investigation observations after discussion with Senior Management.
- Any other step that may be required to avoid further hindrance to the organization and the client will be taken with relevant approvals.

- **IG Processing Fee:**

In view of cost and efforts involved, we will be debiting charges of Rs. 2000/- per Investor Grievance received by us from any regulators in Authorized Persons master account as IG processing fee. However, if the complaint of the client is also received from multiple Regulators; charges will be debited only once for each client (i.e. if the same complaint of client is received from more than one regulators (viz. BSE, NSE, MSEI, MCX, NCDX etc.) charges of Rs 2000/- will be debited. No separate regulator wise charges will be levied. Also, these charges will be debited to Authorized Persons only if we identify any process gaps/service defaults/wrong doings at his end which led to receipt of complaint from exchanges/regulators.

9. MIS

Management on quarterly basis is informed about the number of complaints received, pending together with ageing analysis, nature of complaints, details of highest branch/ AP whose customers have raised complaints etc. during the quarter.

Additionally, management is immediately informed about any serious complaint involving large value on case to case basis. Also, any improvement done or area of lacunae identified should be included in the MIS.

Daily MIS for complaints crossing TAT should be made available to Director, Compliance Officer as well as concerned HODs and Business Heads. Based on analysis of MIS, if felt necessary action is initiated against the concerned Authorized Person / Employee.

10. Regulatory Submissions

In accordance to the regulatory requirement, disclosure of statistics of complaints on MOFSL website & submissions of direct complaints on monthly basis to all the Exchanges through the modes provided by respective Exchange are done within prescribed deadlines.

Similarly, BO grievance reports are submitted to both the Depository i.e. CDSL/ NSDL on monthly basis through the modes provided by Depository within prescribed deadlines

11. Internal Audit

Compliance Department may conduct internal audit for assessing the adherence to the above said process.