



INDIA BOND PRIVATE LIMITED

INVESTOR GRIEVANCE REDRESSAL MECHANISM

Adoption / Amendment of the Policy	Board Meeting Date	Version
Adoption of the Policy	April 25, 2023	1.0
Review of the Policy	March 30, 2024	1.1
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Introduction:

India Bond Private Limited ("**IndiaBonds**" or "**the Company**") believes that Investor service is vital element for sustained business growth and for better corporate governance. The Company's approach is to treat and service all Investors' consistently and fairly. The Company endeavours to redress 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, 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 shared for such grievances/complaints. The Investor Redressal Mechanism of the Company is based on the following principles:

1. Investors are treated fairly at all times.
2. Grievances/Complaints raised by Investors are dealt with courtesy and in a timely manner.
3. Grievances/Complaints are treated efficiently and fairly.
4. The employees and management of the Company work in good faith and towards the interests of the Investors.

Applicability and Objective:

SEBI (Stock-Brokers) Regulations, 2026 mandates implementation of Investor Grievance Mechanism by all the Stock Brokers 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 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 Compliance Officer appointed under SEBI (Stock Brokers) Regulations, 2026, as Investor Grievance Redressal Officer, who can be approached in case of any grievance/ complaint.

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.
- c. "**Client**" or "**Investor**" means any Person who uses/ avails the Services of the Company.
- d. "**Company**" or "**IndiaBonds**" means India Bond Private Limited.
- e. "**Online Bond Platform**" means any electronic system, other than a recognised stock exchange or an electronic book provider platform, on which the debt securities which are listed or proposed to be listed, are offered and transacted.

- f. **“Grievance”** means any written grievance or complaint related to the transaction of buying or selling of securities through the online bond platform of IndiaBonds or the services rendered by IndiaBonds in its capacity as an Online Bond Platform Provider or Stock Broker and/or its authorized representatives.
- g. **“Investor Grievance Redressal Officer”** means the Compliance Officer appointed under the provisions of SEBI (Stock Brokers) Regulations, 2026.
- h. **“Stock Brokers Regulations”** means SEBI (Stock Brokers) Regulations, 2026, as amended from time to time.
- i. **“Mechanism”** means Investor Grievance Redressal Mechanism of the Company.
- j. **“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 Stock Brokers Regulations or Circulars notified by SEBI.

Steps for handling Investor Grievances:

1. The procedure and actions mentioned in this mechanism shall only be applicable for categories of complaints listed in **“Annexure - I”** and shall lodge the Complaint on the below given email ids in the prescribed format as specified in **“Annexure - III”**.
2. The Company has a designated email id i.e. grievance@indiabonds.com for handling investor grievances on which investors can submit his/her grievances/complaints.
3. Also, an Investor shall submit a written grievance/complaint marking it to the Investor Grievance Redressal Officer at 605, 6th Floor, Windsor, Off CST Road, Kalina, Santacruz (East), Mumbai City, Mumbai, Maharashtra, India, 400098.
4. 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.
5. The Investors who wish to lodge a complaint on SCORES 2.0 (complainant) are required to register themselves on <https://scores.sebi.gov.in/>. For any queries, feedback or assistance, clients may contact SEBI office on Toll Free Helpline at 1800 22 7575/1800 266 7575.

➤ Filing complaints on SCORES 2.0 – Easy & Quick

- (a) **Register on SCORES 2.0 portal**
- (b) **Mandatory details for filing complaints on SCORES:**
 - (i) Name
 - (ii) PAN
 - (iii) Address
 - (iv) Mobile Number
 - (v) Email ID.

Benefits:

- (a) Effective Communication.**
- (b) Speedy redressal of the grievances.**

Additionally, you may also download the SEBI SCORES app from [Play Store](#) and [App Store](#)

6. The complainant may use SCORES 2.0 to submit the complaint or grievance directly to the Company and such a Complaint shall be dealt in the manner specified in “Annexure – II”.
7. The Investor may contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on SCORES 2.0. The list of IAs is available on SEBI website (www.sebi.gov.in) (Path – Home » Intermediaries/ Market Infrastructure Institutions » Recognised Intermediaries » Recognised Investors Associations).
8. 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.
9. The Investor Grievance Redressal Officer gathers all information available on the grievance/complaint which is considered necessary for a proper investigation. He looks into all the necessary information and undertakes to resolve them as soon as possible.
10. 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.

Resolution mechanism for Offline Complaints:

Any investor who wishes to report any grievance/complaint shall submit the same in the prescribed format as specified in “Annexure III” to below mentioned Email id:

Investor Grievance Redressal Officer

605, 6th Floor, Windsor, Off CST Road, Kalina, Santacruz (East),

Mumbai City, Mumbai, Maharashtra, India, 400098

Phone No.: 022-4187 1200

Email Id: grievance@indiabonds.com

If not satisfied with the response of the Investor Grievance Redressal Officer:

In case, the Client does not receive a response or if the Client is dissatisfied with the response received from the Investor Grievance Redressal Officer, the Client may escalate the complaint to the next level Officer as indicated below:

Director

605, 6th Floor, Windsor, Off CST Road, Kalina, Santacruz (East),
Mumbai City, Mumbai, Maharashtra, India, 400098
Tel: 022-4187 1200
Email address: anand.sonawane@indiabonds.com

Resolution mechanism for Online Complaints through SCORES:

1. In case Investor has approached the Company for redressal of the Complaint and 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 may submit an online complaint / grievance through SCORES 2.0 at <https://scores.sebi.gov.in/>
2. 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.
3. The given complaint shall be simultaneously forwarded to Designated Body, i.e., relevant Stock Exchange ("Stock Exchange") selected at the time of submission of Complaint on the Scores 2.0. The Designated Body to ensure that the Company shall submit the ATRs with the stipulated timeline.

4. 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.

5. 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 makes a request for a review of the resolution provided by the Company within 15 calendar days from the date of submission of ATR by Designated Body

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. Hence, mere filing of ATR with respect to SEBI review complaint will not mean that the SEBI review complaint is disposed.

[SEBI Circular SEBI/HO/OIAE/OIAE IAD-1/P/CIR/2023/131 dated July 31, 2023](#)

Initiation of the Dispute Resolution Mechanism

After exhausting the aforementioned options for resolution of grievance, 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 [Smart ODR Portal](#).

The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in terms of the paragraphs above or SCORES 2.0 guidelines as applicable or not pending before any Arbitral process, Court, Tribunal or Consumer forum or are 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) or is against the Government of India / President of India or a State Government / Governor of a State.

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.

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.

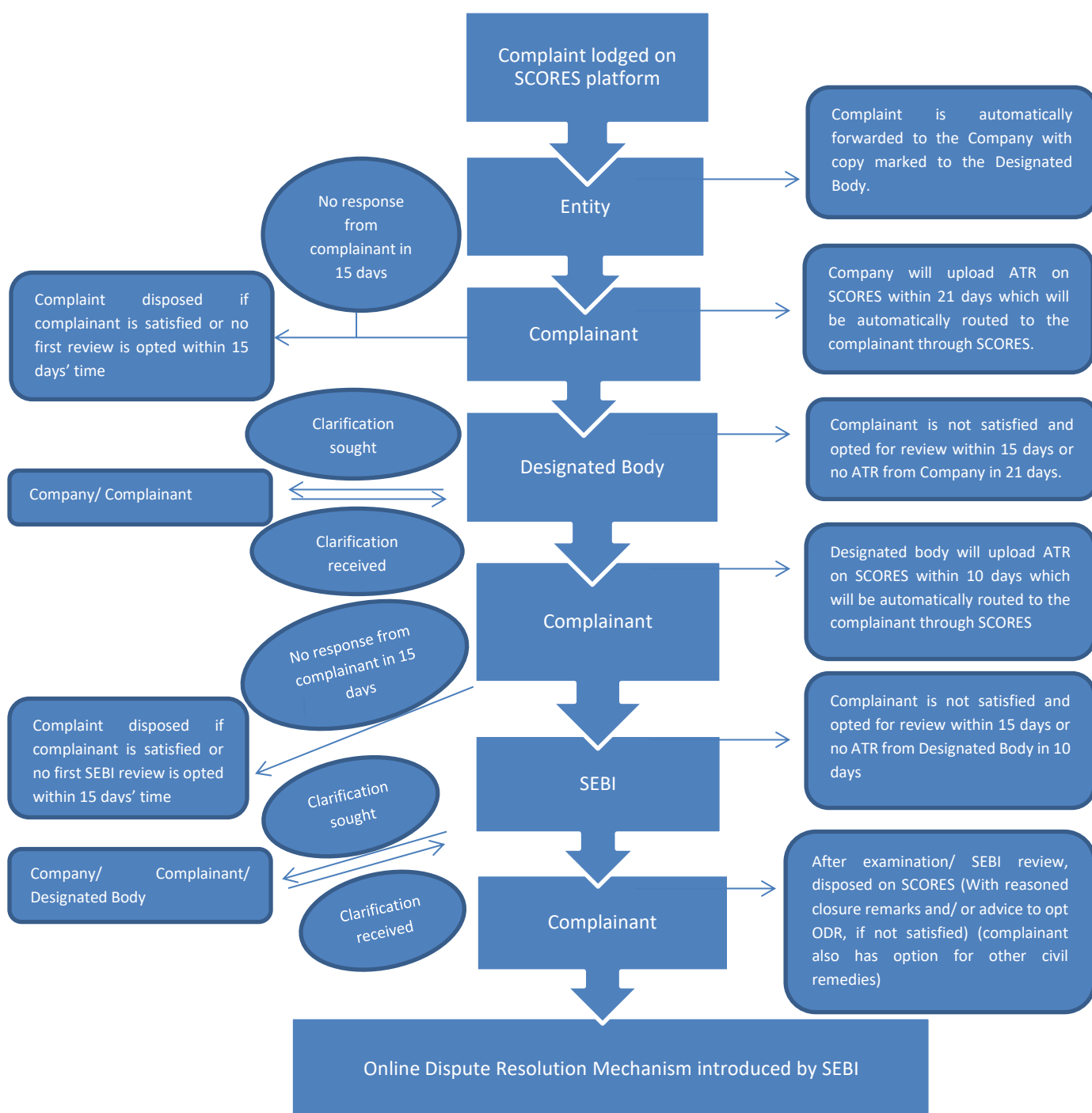
Important links:

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

Annexure – I – “Nature of Complaints”

1. Account opening/ closing/ suspension related
2. Technical glitches/outage/connectivity/system related problem
3. Excess brokerage
4. Improper Service
5. IPO Application related
6. Non-receipt/delay in receipt of Funds
7. Non-execution of order
8. Non-receipt of corporate benefits
9. Assured return being offered
10. Non updation of address /Signature or Corrections etc
11. Non-receipt or delay in receipt of securities
12. Complaints of any other nature as may be notified under applicable regulations from time to time

Annexure – II – “Online Redressal Mechanism”



Annexure – III – “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***