

# Investor Grievance Redressal Policy

VIREYA CAPITAL MANAGEMENT LLP

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<b>Classification</b>	<b>Distribution List</b>
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## **Investor Grievance Redressal policy**

### **1. Preface**

The objective of the policy is to address the grievances of the customers. This policy has been formulated in order to ensure that grievances of the customers are effectively & timely redressed.

For the purpose of this policy, <company name> shall be referred as Intermediary.

### **2. Receipt of complaint**

Channels available for investors for registering of complaints are as follows:

1. Email ID and Helpline number- Investors can log their complaint or escalate the investor grievance directly to the intermediary at email ID (rakhi.notani@vireyacapital.com) or helpline number (+91 8454842053)
2. Compliance Officer - Investors can contact the Compliance Officer for redressal of grievances
3. SEBI Complaints Redress System (SCORES) - Investors can lodge complaint on SCORES (<https://scores.sebi.gov.in/scores/Welcome.html>)
4. Online dispute resolution (SMART ODR) - Investors can lodge complaint on SMART ODR (<https://smartodr.in/login>)
5. The client may also file complaint through physical letter or by visiting the office of the intermediary.

### **3. Maintenance of investor grievance register**

The intermediary shall maintain an investor grievance register which shall contain details of grievances received from client in all modes (email, physical visit/letters, SCORES, etc.). The Compliance officer shall verify and initial all the resolved grievances recorded in the Investor grievance register.

### **4. Redressal mechanism**

- (i) Redressal of investor grievances shall be the primary responsibility of the Compliance Officer.
- (ii) Investor grievance received in any mode shall be resolved within 21 days from date of receipt of the grievance.
- (iii) Escalation matrix of the intermediary shall be as follows:

<b>Sr. No</b>	<b>Details</b>	<b>Time Frame</b>
1	Client Servicing / Customer Care	Up to 3 working days
2	Escalation to Compliance Officer if not resolved at the operational level	Up to 7 working days
3	Escalation to Principal Officer if not resolved at Compliance Officer level.	Up to 15 working days
4	Escalation to Board if not resolved at Principal Officer level	To be solved within 21 working days

- (iv) In case the complaint is not resolved, the client can file arbitration in in the jurisdiction where the registered office of the intermediary is located.

#### **Grievances received on SCORES:**

- (i) In case of grievances received on SCORES, the intermediary shall upload the Action taken report (ATR) within 21 days from date of receipt of grievance.
- (ii) In case the investor is satisfied or no response is received within 15 days from uploading of ATR, the complaint will be disposed by the Designated body (APMI/BASL).
- (iii) In case the investor is not satisfied with the ATR, he may request for a review of the resolution within 15 days of uploading of ATR.
- (iv) In case the investor has requested for a review of the resolution provided by the intermediary or the intermediary has not submitted the ATR within the stipulated time of 21 days, the concerned Designated Body shall take cognizance of the Complaint for first review of the resolution through SCORES.
- (v) The Designated Body may seek clarification on the ATR submitted by the intermediary for the first review. The Designated Body shall submit the revised ATR to the investor on SCORES within 10 days of the review sought.
- (vi) In case the investor is satisfied or no response is received within 15 days from uploading of ATR, the complaint will be disposed off.
- (vii) In case the investor is not satisfied with the ATR provided by the Designated Body or the concerned Designated Body has not submitted the ATR within 10 days, SEBI may take cognizance of the Complaint for second review through SCORES.
- (viii) The intermediary and/or Designated Body shall take immediate action on receipt of second review complaint from SEBI and submit revised ATR to SEBI through SCORES, within the timeline specified by SEBI.
- (ix) 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

## **5. Review of complaint**

- (i) The Compliance Officer shall regularly monitor and review complaints according to its nature, originating branch, etc. and on the basis of such analysis, inform the management to take adequate steps to strengthen the redressal systems.
- (ii) The Principal Officer/Managing director shall review the status of pending complaints on a periodic basis.
- (iii) An MIS of complaints received, resolved and pending during the quarter shall be placed before the Board of directors for their review.

## **6. Other compliances**

- (i) The intermediary shall display the following on its website/mobile application:
  - (a) Details of all grievances including SCORES grievances received by it in SEBI prescribed format by 07<sup>th</sup> of the succeeding month.
  - (b) Link of SMART ODR.
  - (c) Link to SCORES.
  - (d) Link to lodge complaint with the intermediary directly.
- (ii) The intermediary shall display information related to grievance redressal as per Annexure-B of SEBI circular CIR/MIRSD/3/2014 dated 28<sup>th</sup> August, 2014 on the notice board at its registered office.

## **7. Maintenance of records**

The Investor grievance register shall be maintained for such period as prescribed by the regulatory authority.

## **8. Review of the policy**

The policy shall be reviewed as and when management thinks fit or whenever changes are mandated by statutory authorities.