

KFIN TECHNOLOGIES LIMITED

**POLICY ON INVESTOR GRIEVANCE REDRESSAL
MECHANISM**

SIGNATORIES

Version	Prepared by	Reviewed by	Approved by
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Table of Contents

1. INTRODUCTION	4
2. APPLICABILITY AND OBJECTIVE	4
3. DEFINITIONS	5
4. REGISTRATION AND LODGEMENT OF INVESTOR GRIEVANCES.....	6
5. ROLES AND RESPONSIBILITIES	7
6. STEPS FOR REDRESSAL OF INVESTOR GRIEVANCES	8
7. REDRESSAL OF COMPLAINTS THROUGH SCORES	10
8. DISPUTE RESOLUTION THROUGH ONLINE DISPUTE RESOLUTION (“ODR”) PORTAL	12
9. MEASURES TAKEN BY KFIN TO RESOLVE INVESTOR COMPLAINTS	13
10. MONITORING, ANALYSIS AND REPORTING OF INVESTOR GRIEVANCES.....	14
11. PRESERVATION OF RECORDS.....	15
12. REVIEW AND AMENDMENT	15
ANNEXURE I.....	17
ANNEXURE II	17
ANNEXURE III	19
ANNEXURE IV	20
ANNEXURE V	21

1. INTRODUCTION

KFin Technologies Limited ("KFintech" or "the Company"), being a SEBI registered Registrar and Share Transfer Agent ("RTA"), recognizes investor protection, service excellence and effective grievance redressal as integral components of its governance framework and regulatory obligations.

Investor grievances constitute an important feedback mechanism and provide valuable insights into operational effectiveness, service quality and investor experience. A structured grievance redressal framework assists in identifying service gaps, improving operational controls and enhancing investor confidence.

Accordingly, KFintech has established this Investor Grievance Redressal Mechanism ("Policy") to facilitate timely receipt, assessment, investigation, resolution, monitoring and closure of investor grievances in accordance with applicable regulatory requirements.

The grievance redressal framework of the Company is based on the following guiding principles:

- Investors shall be treated fairly and impartially at all times.
- Investor grievances shall be handled in a transparent and time-bound manner.
- Complaints shall be investigated objectively and resolved based on facts and applicable regulations.
- Appropriate escalation mechanisms shall be available to investors.
- Recurring complaints shall be analyzed to identify root causes and corrective actions.
- The Board and Senior Management shall maintain periodic oversight over investor grievance trends and resolution effectiveness.

2. APPLICABILITY AND OBJECTIVE

This Policy has been formulated pursuant to applicable provisions and shall be effective upon approval received from the Board:

- Securities and Exchange Board of India (SEBI) Act, 1992.
- Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2025, as amended from time to time.
- SEBI Master Circular for Registrars to an Issue and Share Transfer Agents dated February 6, 2026, as amended or replaced from time to time.
- SEBI Circular No. SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023 relating to redressal of investor grievances through SCORES and linking the process with Online Dispute Resolution ("ODR").
- SEBI Circular No. SEBI/HO/MIRSD/MIRSD-PoD/P/CIR/2025/67 dated May 14, 2025 on the Investor Charter for Registrars to an Issue and Share Transfer Agents (RTAs), as amended from time to time.

- SEBI Master Circular No. SEBI/HO/OIAE/OIAE_IAD-3/P/CIR/2023/195 dated December 28, 2023 on Online Resolution of Disputes in the Indian Securities Market, together with all applicable SEBI circulars, directions and regulatory guidance issued or amended from time to time.
- Where the Company provides services in any other SEBI-regulated capacity or in relation to a product or entity governed by a more specific grievance redressal requirement, the applicable entity/product-specific regulation, circular, charter or timeline shall apply in addition to this Policy, and shall prevail to the extent of any inconsistency.

The objectives of this Policy are to:

- Establish a centralized grievance management framework.
- Ensure timely and effective redressal of investor grievances.
- Provide investors with clearly defined communication and escalation channels.
- Facilitate compliance with SCORES and ODR requirements.
- Establish accountability and governance for grievance handling.
- Strengthen investor confidence and service quality.
- Enable periodic monitoring and reporting to Senior Management and the Board.

3. DEFINITIONS

"Board" means the Board of Directors of KFin Technologies Limited.

"Complaint" or "Grievance" means any written or electronic communication expressing dissatisfaction relating to services rendered by the Company and/ or services as specified in "Annexure I" of this Policy.

"Designated Body" means the stock exchange, depository, industry association, or any other body designated by SEBI from time to time to monitor and review investor grievance redressal by the concerned regulated entity through the SCORES platform.

"Investor" means any shareholder, debenture holder, security holder, applicant, unit holder or any person availing investor servicing activities handled by the Company as well as any potential investor who has applied or submitted application for subscribing to the company.

"SEBI" means Securities and Exchange Board of India

"SCORES" means SEBI Complaint Redress System established by SEBI for online redressal of investor complaints.

"ATR" means Action Taken Report submitted through SCORES.

"ODR" means the Online Dispute Resolution mechanism established under the SEBI framework and operated through the common SEBI-designated ODR Portal (currently SMART ODR).

"Market Participant" means a listed company, specified intermediary or regulated entity covered under the SEBI ODR framework, including the Company to the extent applicable to its activities as an RTA.

"Investor Grievance Redressal Officer" means the designated official responsible for monitoring and resolution of investor grievances.

Words and expressions not defined herein shall have the meaning assigned under applicable SEBI regulations and circulars.

4. REGISTRATION AND LODGEMENT OF INVESTOR GRIEVANCES

KFintech shall establish and maintain appropriate communication channels to facilitate easy lodging of investor complaints.

4.1 Receipt and Registration of Investor Grievances

KFin Technologies Limited ("KFintech") shall establish and maintain appropriate channels to enable investors to conveniently lodge grievances, complaints, service requests and queries. Investor grievances may be received through various modes, including but not limited to:

- Designated investor grievance e-mail addresses;
- The Company's website and online investor service platforms;
- Investor service centres and customer support channels;
- References received from issuer companies;
- SEBI Complaints Redress System (SCORES);
- Stock Exchanges;
- Depositories;
- Regulatory, governmental or statutory authorities; and
- Any other communication channel notified by the Company from time to time.

The contact details of the Investor Grievance Redressal Officer and designated escalation authorities shall be prominently displayed on the Company's website and made available through appropriate investor communication channels to facilitate timely grievance redressal.

4.2 Complaint Recording and Tracking

All investor grievances received by the Company shall be recorded, monitored and tracked through a centralized grievance management system to ensure timely resolution and regulatory compliance.

The grievance management system shall, at a minimum, capture the following information:

- Unique complaint reference number;
- Date of receipt of the complaint;
- Investor identification and contact details;
- Nature and category of grievance;
- Source/channel of receipt of the complaint;
- Department or officer responsible for resolution;
- Current status and stage of processing;
- Actions taken and communications sent; and

- Date and manner of closure of the complaint.
- SCORES complaint number, ATR submission date and review/escalation status, where applicable.
- ODR reference, stage and outcome, where applicable.

The contact details of the Investor Grievance Redressal Officer and escalation authorities shall be displayed on the Company's website and communicated through appropriate investor servicing channels. The details of which are mentioned in “**Annexure I**”

4.3 Investor Charter and Public Disclosures

The Company shall comply with the Investor Charter for RTAs specified by SEBI from time to time and shall bring the Investor Charter to the notice of existing and new investors by disseminating it on the Company website and through appropriate electronic communication, and by displaying it at prominent places in offices, as applicable.

The Company shall disclose on its website the prescribed data on complaints received against it or against issues dealt with by it and the redressal thereof, in the format specified by SEBI, latest by the 7th day of the succeeding month.

5. ROLES AND RESPONSIBILITIES

All concerned personnel and governing bodies are responsible for ensuring that investor grievances are handled promptly, fairly, and in compliance with applicable regulatory requirements. To ensure clarity of ownership and accountability in the investor grievance redressal process, the roles and responsibilities of the concerned personnel and governing bodies are mapped in the RACI Matrix below. The matrix identifies the individuals or functions that are Responsible (R), Accountable (A), Consulted (C), and Informed (I) for key activities relating to the receipt, investigation, resolution, monitoring, reporting, and oversight of investor grievances.

Activity / Responsibility	Responsible (R)	Accountable (A)	Consulted (C)	Informed (I)
Receipt and logging of investor grievances	GRO	GRO	Operations Team	Senior Management, Board
Acknowledgement of investor grievances	GRO	GRO	Operations Team	Senior Management
Investigation of investor grievances	Operations Team, GRO	GRO	Senior Management	Board
Collection of supporting information and records	Operations Team	Operations Team	GRO	Senior Management
Coordination with stakeholders for grievance resolution	GRO	GRO	Operations Team, Senior Management	Board
Resolution and closure of investor grievances	GRO, Operations Team	GRO	Senior Management	Board

Activity / Responsibility	Responsible (R)	Accountable (A)	Consulted (C)	Informed (I)
Communication of resolution to investors	GRO	GRO	Operations Team	Senior Management
Implementation of corrective and preventive actions	Operations Team	Senior Management	GRO	Board
Maintenance of grievance records and registers	GRO	GRO	Operations Team	Senior Management
Preparation of grievance reports/MIS	GRO	Senior Management	Operations Team	Board
Monitoring grievance trends and recurring issues	GRO	Senior Management	Operations Team	Board
Escalation of significant or unresolved grievances	GRO	Senior Management	Operations Team	Board
Review of escalated grievances	Senior Management	Senior Management	GRO	Board
Allocation of resources for grievance handling	Senior Management	Senior Management	GRO	Board
Periodic review of the grievance redressal framework	GRO	Senior Management	Operations Team	Board
Review of material investor grievance matters	Senior Management	Board of Directors	GRO	Operations Team
Oversight of grievance redressal mechanism	Senior Management	Board of Directors	GRO	Operations Team
Ensuring investor protection and regulatory compliance	GRO, Operations Team, Senior Management	Board of Directors	-	-

6. STEPS FOR REDRESSAL OF INVESTOR GRIEVANCES

The Investor Grievance Redressal function shall operate under the oversight of the Compliance Department and designated operational teams to ensure timely, fair and effective resolution of investor grievances.

Step 1 – Receipt and Registration of Complaint

Upon receipt of an investor grievance through any channel, including email, website, SCORES, regulatory authorities or any other mode, the complaint shall be recorded in the Company's grievance management system and assigned a unique reference number for tracking and monitoring purposes.

Step 2 – Preliminary Review and Classification

The complaint shall be reviewed and classified based on its nature, complexity and materiality. Such assessment may include consideration of:

- Nature and subject matter of the grievance;
- Operational complexity involved in resolution;
- Regulatory or compliance implications;
- Requirement for involvement of issuers, depositories, banks or other external stakeholders; and
- Potential impact on the investor and the Company's operations.

Step 3 – Investigation and Fact Verification

The concerned team shall undertake an appropriate investigation of the grievance, which may include:

- Verification of transaction details, records and supporting documents;
- Review of account information, service history and prior correspondence;
- Coordination with issuers, depositories, registrars and transfer agents, banks or other relevant stakeholders, as applicable; and
- Collection of additional information or documentation necessary for resolution of the grievance.

Step 4 – Resolution and Communication

Based on the findings of the investigation, appropriate corrective, remedial or preventive action shall be undertaken. The resolution, together with reasons and supporting information where relevant, shall be communicated to the investor in a clear, fair and timely manner. Such communication shall inform investors of their right to escalate unresolved grievances through appropriate channels, including the SEBI Complaints Redress System (SCORES) and the Online Dispute Resolution (ODR) platform, in accordance with applicable regulatory requirements.

Step 5 – Closure and Record Retention

A grievance shall be considered closed only upon completion of the resolution process and communication of the outcome to the investor. All records relating to the complaint, investigation, correspondence, resolution and closure shall be maintained in accordance with the Company's Record Retention Policy and applicable regulatory requirements.

Timelines for Resolution

The Company shall redress investor grievances promptly and, in any event, not later than 21 calendar days from the date of receipt of the grievance, in accordance with Regulation 21 of the SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 2025 and the applicable SCORES framework, or within such shorter or different timeline as may be specifically prescribed by SEBI or any other competent regulatory authority from time to time.

7. REDRESSAL OF COMPLAINTS THROUGH SCORES

KFintech shall maintain the requisite SCORES authentication for each applicable intermediary registration/category, continuously monitor the current SCORES platform and ensure compliance with the timelines, routing, review and ATR requirements prescribed by SEBI from time to time.

The Company shall:

- Review complaints received through SCORES on a daily basis.
- Assign ownership to designated officials immediately upon receipt.
- Investigate the grievance and obtain necessary clarifications.
- Upload Action Taken Reports (ATRs) on SCORES within the prescribed timeline.
- Maintain adequate documentary evidence supporting complaint closure.

7.1 Steps for handling Investor Grievances:

- a) The procedure and actions mentioned in this mechanism shall apply to investor complaints falling within the scope of SCORES and the Company's RTA activities. "**Annexure II**" is illustrative and the complaint categories available on the current SCORES platform shall prevail. "**Annexure III**" sets out the online redressal flow and "**Annexure IV**" summarises the current SCORES timelines. Matters not dealt with through SCORES are summarised in "**Annexure V**".
- b) KFintech has designated email id for redressing grievance related to:
 - i. all companies - equity, bonds, unlisted, Anil Dhirubhai Ambani Group (ADAG) related grievances: einward.ris@kfintech.com
 - ii. Mukesh Dhirubhai Ambani Group (MDAG) related company grievance: rilinvestor@kfintech.com
 - iii. mutual funds: soa2demat@kfintech.com
- c) The Company has designated compliance.corp@kfintech.com for handling investor grievances and complaints. Investors may submit grievances through this channel and the other channels specified in this Policy. In case of escalation, the contact details of the Investor Grievance Redressal Officer / Compliance Officer shall be kept updated and made available on the Company's website.
- d) The Investor Grievance Redressal Officer shall track grievances and complaints received through the designated e-mail IDs, the Company's servicing channels, SCORES and any other applicable mode on an ongoing basis. Investor grievances shall be redressed promptly and not later than 21 calendar days from the date of receipt, subject to any more stringent timeline prescribed for a specific service or complaint.
- e) Investors wishing to lodge a complaint on SCORES shall register or sign in on the current SCORES portal using the process prescribed by SEBI, including verification/fetching of KYC information, and shall provide the mandatory information required by the portal from time to time.

- f) The complainant may lodge the complaint on SCORES by selecting the appropriate category/sub-category and the concerned SEBI-regulated entity. The Company shall not prescribe a fixed SCORES category in this Policy, since the portal taxonomy may be modified by SEBI from time to time.
- g) An investor should first take up the grievance with the concerned entity. A complaint may thereafter be lodged on SCORES within one year from the date of occurrence of the cause of action, subject to the conditions, jurisdictional requirements and exceptions prescribed by SEBI from time to time. A complaint filed beyond the applicable limitation period may be rejected by SEBI.
- h) The details of the complaints which shall not be dealt through SCORES are provided in “**ANNEXURE V**”
- i) The investor may contact Investor Associations recognised by SEBI or use the assistance facilities made available by SEBI for support in filing or tracking complaints on SCORES. The current list of recognised Investor Associations is available on SEBI’s website. Investors may also seek assistance through SEBI’s toll-free helplines 1800 266 7575 and 1800 22 7575, or such other helpline numbers as SEBI may notify.
- j) To enhance investor satisfaction on complaint redressal, 'First & Second Review' is also available under online resolution mechanism:

1. First review of the Complaint:

- a. In case complainant is satisfied with the resolution provided by the entity vide the ATR or complainant does not choose to review the Complaint, the Complaint shall be disposed on SCORES. However, if the complainant is not satisfied, the complainant may request for a review of the resolution provided by the entity within 15 calendar days from the date of the ATR.
- b. If the complainant seeks a first review of the resolution provided by the Entity, or if the Entity does not submit the ATR within 21 calendar days of receipt of the complaint, the concerned Designated Body shall take up the first review through SCORES, wherever required, and submit its ATR to the complainant within 10 calendar days in accordance with the current SCORES framework.
- c. The Designated Body may seek clarification from the Entity or the complainant during first review. The Company shall provide such clarification within the timeline stipulated through SCORES so that the Designated Body is able to submit its ATR within the applicable 10-calendar-day timeline.

2. Second Review of the Complaint:

- a. The complainant may seek a second review of the Complaint within 15 calendar days from the date of the submission of the ATR by the Designated Body. In case the complainant is satisfied with the ATR provided by the concerned Designated Body or

complainant does not choose to review the Complaint within the period of 15 calendar days, the Complaint shall be disposed on SCORES.

- b. In case the complainant is not satisfied with the ATR provided by the Designated Body or the concerned Designated Body has not submitted the ATR within 10 calendar days, SEBI may take cognizance of the Complaint for second review through SCORES.
- c. 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, within the timeline specified by SEBI.
- d. SEBI or the Designated Body (as the case may be) may seek clarification on the ATR submitted by the concerned entity for SEBI review complaint. 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. Hence, mere filing of ATR with respect to SEBI review complaint will not mean that the SEBI review complaint is disposed.

8. DISPUTE RESOLUTION THROUGH ONLINE DISPUTE RESOLUTION (“ODR”) PORTAL

8.1 Initiation of the dispute resolution process:

- a. An investor/client shall first take up the grievance directly with the concerned Market Participant. If the grievance is not satisfactorily resolved, the investor/client may escalate it through SCORES and, after exhausting such route, may initiate dispute resolution through the ODR Portal. Alternatively, as permitted under the SEBI ODR framework, the investor/client may initiate ODR after the grievance lodged with the Market Participant remains unresolved or at any stage of the subsequent escalation process, subject to the restrictions below.
- b. The investor/client may initiate dispute resolution through the ODR Portal if the grievance lodged with the concerned Market Participant was not satisfactorily resolved, or at any stage of subsequent escalation, provided that the same complaint/dispute is not simultaneously under consideration through SCORES or another prohibited forum/process.
- c. The concerned Market Participant may also initiate dispute resolution through the ODR Portal after having given due notice of at least 15 calendar days to the investor/client for resolution of the dispute which has not been satisfactorily resolved between them.
- d. Dispute resolution through the ODR Portal shall be initiated only within the applicable law of limitation and cannot be initiated when the complaint/dispute:
 - is under consideration in terms of the paragraph 8.1 (a) above;
 - is under consideration as per SCORES 2.0 guidelines;

- is pending before any arbitral process, court, tribunal or consumer forum;
 - is 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);
 - is against the Government of India / President of India or a State Government / Governor of a State.
- e. In case the Client opts for Online Dispute Resolution mechanism or other appropriate civil remedies while the complaint is pending on SCORES 2.0 portal, the pending complaint shall be treated as disposed on SCORES 2.0.

8.2 Responsibilities of the Company under the Online Dispute Resolution (ODR) Framework

- a. The Company shall comply with the Online Dispute Resolution ("ODR") framework prescribed by SEBI from time to time, maintain its enrolment on the SEBI-designated common ODR Portal, and ensure that investor/client agreements, contractual arrangements and relationships incorporate or are deemed to incorporate the applicable ODR dispute-resolution provisions to the extent mandated by SEBI.
- b. The Company shall promptly address and resolve investor grievances and disputes in accordance with applicable SEBI requirements and shall prominently inform investors of the availability of SCORES and the ODR Portal for unresolved grievances/disputes. A link to the ODR Portal shall be displayed on the home page of the Company's website and on applicable mobile applications, in accordance with the SEBI ODR framework.
- c. The Company shall ensure that its relevant personnel are adequately trained annually/ periodic as required in handling investor grievances, SCORES and ODR matters, and shall extend all necessary cooperation and coordination to Market Infrastructure Institutions (MIIs), ODR Institutions and other regulatory authorities in connection with conciliation and arbitration proceedings.
- d. The Company shall further comply with such deposit, funding, award-payment or other obligations as may be prescribed by SEBI, MIIs or any designated authority under the ODR framework from time to time.

9. MEASURES TAKEN BY KFIN TO RESOLVE INVESTOR COMPLAINTS

The Company is committed to ensuring timely and effective resolution of investor grievances received through the SEBI Complaints Redress System (SCORES). In this regard, the following framework shall be followed:

1. **Turnaround Time (TAT):** The Company may maintain internal service-level targets that are shorter than the regulatory outer limit. As an internal operating objective, complaints should ordinarily be resolved as early as practicable, including within 24 hours where feasible, and

matters dependent on third-party information should be actively escalated. For complaints on SCORES, the regulatory requirement is to resolve the complaint and upload the ATR within 21 calendar days of receipt. Any shorter internal target, including a 7-working-day target for ATR readiness/submission, shall be treated only as an internal control benchmark and shall not be construed as replacing or extending the applicable SEBI timeline. Third-party dependency shall not, by itself, extend the regulatory deadline unless specifically permitted by SEBI or another competent authority.

2. **Monitoring and Governance:** SCORES complaints shall be monitored through periodic Management Information System (MIS) reports circulated to the Grievance Redressal Team at regular intervals during the day. Internal review meetings shall be conducted periodically to monitor complaint status, track TAT adherence and ensure timely closure of cases.
3. **Closure of Complaints:** All efforts shall be made to ensure closure of pending SCORES complaints within the prescribed timelines. Any complaint remaining open at the end of a reporting period shall be subject to management review. Complaints involving regulatory, legal or other exceptional circumstances may remain open until the necessary resolution is achieved.
4. **Dedicated Oversight:** The Company shall maintain adequate and dedicated resources for the monitoring, escalation and resolution of SCORES complaints to ensure timely submission of ATRs and compliance with regulatory requirements.
5. **Quality Assurance:** A Quality and Surveillance Review mechanism shall be maintained to assess the adequacy, accuracy and completeness of grievance resolutions. This review shall ensure that responses provided to investors are appropriate, fair and duly updated on the SCORES platform.

10. MONITORING, ANALYSIS AND REPORTING OF INVESTOR GRIEVANCES

The Compliance Department shall periodically review investor grievances and complaints received through various channels, including SCORES, Stock Exchanges, Depositories and other regulatory authorities, to assess the effectiveness of the grievance redressal framework and identify areas requiring improvement.

Such review shall include, inter alia:

- Analysis of the overall volume of complaints received and resolved during the review period.
- Identification and assessment of key complaint categories to determine recurring issues and underlying causes.
- Monitoring of aging and pendency of complaints to ensure adherence to prescribed turnaround timelines and timely closure of grievances.
- Review of repeat or recurring complaints from investors to identify systemic concerns and implement corrective measures.
- Analysis of issuer-wise and product/service-wise complaint trends to identify areas requiring enhanced oversight or process improvements.

- Evaluation of service-level performance against internal and regulatory timelines, including the timeliness and quality of responses provided to investors.
- Monitoring of complaints received from regulatory authorities and government bodies, including SEBI, Stock Exchanges, Depositories, MCA, Centralized Public Grievance Redress and Monitoring System (CPGRAMS), Department of Administrative Reforms and Public Grievances (DARPG) and other competent authorities.
- Review of SCORES complaints, including pending cases, escalations, first-level and second-level reviews, and the adequacy of Action Taken Reports (ATRs) submitted.
- Identification of emerging risks, compliance concerns and operational gaps arising from complaint trends and implementation of appropriate preventive and corrective actions.
- Monitoring of timely publication of the prescribed monthly complaint-disclosure data on the Company's website, latest by the 7th day of the succeeding month.

The findings of such reviews shall be placed before the appropriate management personnel and/or committees, as applicable, to facilitate continuous improvement in investor servicing standards, strengthen the grievance redressal mechanism and ensure compliance with applicable regulatory requirements.

11. PRESERVATION OF RECORDS

The Company shall maintain comprehensive records relating to investor grievances throughout the complaint lifecycle, including receipt, investigation, correspondence, review, escalation, resolution and closure of complaints. Such records shall include complaint registers, investor communications, internal notes and findings, Action Taken Reports (ATRs), regulatory correspondence, escalation and review records, supporting documentation and closure confirmations.

The Compliance Department shall ensure that all grievance-related records are maintained in a secure, accurate and auditable manner and are preserved for a minimum period of eight years from the date of closure of the complaint, in line with Regulation 18 of the SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 2025, or for such longer period as may be required under any other applicable law, regulatory direction, litigation hold or the Company's Record Retention Policy. Such records shall remain readily available for internal review, audit, regulatory inspection and compliance monitoring.

The Company shall maintain the confidentiality of all investor grievances, grievance records, and investor information received, created, or maintained pursuant to this Policy. Such information shall be accessed, used, shared, stored, and retained only by authorized personnel on a need-to-know basis and solely for the purposes of grievance redressal, regulatory compliance, or other legitimate business purposes. The Company shall implement appropriate administrative, technical, and organizational safeguards to protect such information from unauthorized access, disclosure, alteration, misuse, or loss, in accordance with applicable laws, data privacy requirements, and information security standards.

12. REVIEW AND AMENDMENT

This Policy shall be reviewed periodically and, in any event, at least once every year to ensure its continued adequacy, effectiveness and compliance with applicable laws and regulatory requirements.

The Policy may also be reviewed and revised, as may be considered necessary, pursuant to:

- Changes in applicable laws, rules, regulations or regulatory requirements;
- Issuance of SEBI circulars, guidelines, directions or amendments thereto;
- Recommendations arising from internal audits, statutory audits, compliance reviews or regulatory inspections;
- Material operational, business or process changes affecting the investor grievance redressal framework; and
- Directions, recommendations or decisions of the Board of Directors or any Committee/authority authorized by the Board.

Any amendment, modification or revision to this Policy shall be subject to the approval of the Board of Directors or such other authority as may be delegated by the Board in accordance with applicable laws and the Company's internal governance framework.

ANNEXURE I

Investor Grievance Redressal Mechanism and Contact Details

In order to facilitate the timely redressal of investor grievances, investors may lodge their complaints or queries through the contact channels provided below. The details of the Investor Grievance Redressal Officer and the designated complaint-handling channels shall be prominently displayed on the Company's website and communicated through appropriate investor communication channels.

Particulars	Details
Investor Grievance Redressal Officer	Anish Kumar
Designation	Investor Grievance Redressal Officer
Email ID	compliance.corp@kfintech.com
Contact Number	+02249620337
Registered Office Address	301, The Centrium, 3rd Floor, 57, Lal Bahadur Shastri Road, Nav Pada, Kurla (West), Mumbai – 400 070, Maharashtra, India
Investor Complaint Email ID	einward.ris@kfintech.com
SCORES Portal	https://scores.sebi.gov.in

Escalation and Redressal

1. Investors may submit their grievances, complaints, requests, or queries through any of the communication channels specified above.
2. Investors who are dissatisfied with the resolution provided by the Company may lodge or pursue their complaints through the SEBI Complaints Redress System (SCORES) available at <https://scores.sebi.gov.in>.

The contact details set out in this Annexure shall be reviewed periodically and updated, where necessary, to ensure their continued accuracy and effectiveness.

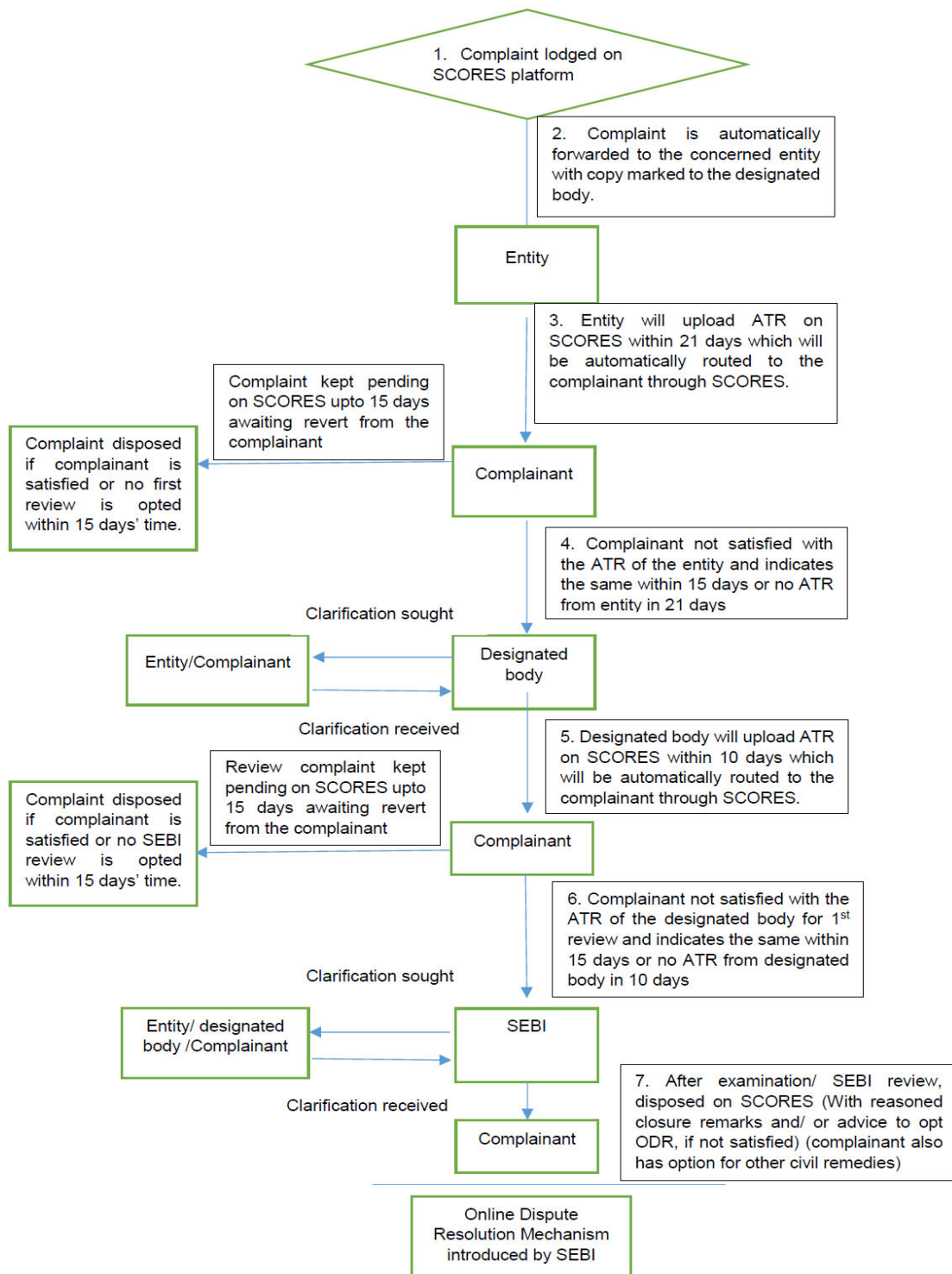
ANNEXURE II

Indicative nature of RTA-related complaints (illustrative; current SCORES categories and applicable SEBI requirements shall prevail)

1. Non updation of address /Signature or Corrections etc
2. Non-receipt of Bonus
3. Non-receipt of Dividend
4. Non-receipt duplicate debt securities certificate
5. Non-receipt of duplicate share certificate
6. Non-receipt of fractional entitlement
7. Non-receipt of interest for delay in dividend
8. Non-receipt of interest for delay in payment of interest on debt security
9. Non-receipt of interest for delay in redemption proceeds of debt security
10. Non-receipt of interest for delay in refunds
11. Non-receipt of interest on securities
12. Non-receipt of redemption amount of debt securities
13. Non-receipt of refund in Public/ Rights issue
14. Non-receipt of Rights Issue form
15. Non-receipt of securities after conversion/ endorsement/ consolidation/ splitting
16. Non-receipt of securities after transfer
17. Non-receipt of securities in public/ rights issue
18. Non-receipt of shares after conversion/ endorsement/ consolidation/ splitting
19. Non-receipt of shares after transfer
20. Non-receipt of shares after transmission
21. Non-receipt of shares in public/ rights issue (including allotment letter)
22. Non-receipt of interest for delay in dispatch/credit of securities
23. Receipt of refund/ dividend in physical mode instead of electronic mode
24. Receipt of shares in physical mode instead of electronic mode
25. Demat /Remat
26. Any other RTA-related complaint category made available on SCORES or otherwise recognised by SEBI from time to time.

ANNEXURE III

ONLINE REDRESSAL MECHANISM



ANNEXURE IV

Sr. No.	SCORES timeline / activity	Timeline
1.	Complaint handling:	
a.	Entity resolves the complaint and uploads the ATR on SCORES.	Within 21 calendar days
2.	First and second review process:	
a.	Investor may seek first review if dissatisfied with the Entity ATR.	Within 15 calendar days of Entity ATR
b.	Designated Body submits ATR for first review.	Within 10 calendar days
c.	Investor may seek second review if dissatisfied with the Designated Body ATR.	Within 15 calendar days of Designated Body ATR
d.	SEBI may take cognizance of the complaint for second review; the Entity / Designated Body shall act within the timeline specified by SEBI.	As specified by SEBI
e.	If an investor opts for ODR or another appropriate civil remedy while the complaint is pending on SCORES, the SCORES complaint is treated as disposed.	At any stage, subject to applicable conditions

ANNEXURE V

The following matters are not ordinarily dealt with as complaints on SCORES. The current SCORES portal/FAQs and applicable SEBI directions shall prevail in case of any change:

1. Complaints not pertaining to investment in the securities market; anonymous, incomplete or non-specific complaints; allegations without supporting documents; and suggestions or requests for guidance/explanation.
2. Matters relating to market intelligence, trading/price manipulation or other alleged violations of securities laws that are required to be submitted through SEBI's Market Intelligence mechanism rather than SCORES.
3. Disputes arising out of private agreements, matters involving fake/forged documents, complaints about unregistered/unregulated activities, and matters falling under the jurisdiction of other regulators, authorities or ministries.
4. Complaints against unlisted/delisted companies, companies on the Dissemination Board, companies under liquidation or resolution under the Insolvency and Bankruptcy Code, companies struck off from the Register of Companies, or vanishing companies, to the extent such matters are outside SCORES jurisdiction.
5. Matters pending before a court or quasi-judicial forum, or disputes pending/concluded under the ODR mechanism; where an investor opts for ODR or another appropriate civil remedy while a complaint is pending on SCORES, the SCORES complaint shall be treated as disposed in accordance with the applicable framework.
6. Claims relating to amounts/securities already transferred to the Investor Education and Protection Fund (IEPF) and complaints relating to freezing/unfreezing of PAN pursuant to enforcement action, which are to be taken up through the forum/portal specified by the competent authority.
7. Any other matter expressly excluded from SCORES or directed to another regulatory/grievance mechanism by SEBI from time to time.