



# Arya Fin-Trade (IFSC) Private Limited

## INVEESTOR GRIEVANCES REDERESSAL AND DISPUTE RESOLUTION POLICY

### BACKGROUND

The IFSCA ( Capital Market Intermediary ) Regulations 2025 under regulations 19 prescribes under Dispute Resolution that

A CMI shall take adequate steps to ensure that disputes between a CMI and its clients and/or investors arising out of or in relation to the activities of the CMI in IFSC shall be dealt with in accordance with the dispute resolution mechanism as may be specified by the Authority.

#### **1.Complaint Handling and Grievance Redressal Policy**

This Policy is adopted pursuant to IFSCA Circular F. No. IFSCA-LPRA/3/2024 dated December 2, 2024, and governs the grievance redressal framework of **Arya Fin-Trade( IFSC) Private Limite** , a Regulated Entity under IFSCA dealing with Consumers in the IFSC

#### **2. Effective Date & Approval**

- **Effective From:** January 15, 2025
- **Approval:** Policy approved by the Board of Directors (or governing body) on [Insert date].

#### **3. Objectives**

- Ensure fair, transparent, and timely resolution of complaints.
- Provide Investor/Consumer confidence via structured escalation and appeal mechanisms.
- Enable corrective and preventive action to reduce recurrence of issues

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#### **4. Scope & Definitions**

##### **4.1 Applicability**

Applicable to all Consumers (as defined under IFSCA AML/KYC Guidelines) excluding Group Entities. Excludes entities such as foreign universities, ancillary service providers, BATF service providers, certain finance companies and treasury centres as per the Circular

##### **4.2 What Constitutes a 'Complaint'**

Defined as a written expression of dissatisfaction regarding services, operations or conduct of the Entity, resulting in alleged loss or wrong. Not including queries, suggestions, anonymous/incomplete submissions, or matters outside the scope of regulated financial products/services .

##### **4.3 Non-Complaint Communications**

- Anonymous or incomplete messages
- Requests for information or guidance
- The market or price fluctuation losses beyond Entity's control
- Internal suggestions or feedback not seeking redress

## 5. Key Roles

- **Complaint Redressal Officer (CRO):** Employee responsible for receiving, assessing, and acting on complaints
- **Complaint Redressal Appellate Officer (CRAO):** Senior official (e.g. Key Managerial Personnel or one level below) handling appeals against CRO decisions

Contact details of both Officers must be disclosed on the website under the heading "Complaint Handling and Grievance Redressal".

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## 6. Complaint Receipt & Assessment

- Complaints can be lodged via email, postal letter, online portal, or in-person form.
  - CRO assesses the complaint within **3 working days**.
  - If accepted, written acknowledgement issued to complainant.
  - If rejected, reasons communicated within **5 working days**
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## 7. Resolution Timelines

- Resolution preferred within **15 days** from acceptance of complaint.
  - In no case should it exceed **30 calendar days**.
  - If rejected, CRO must provide written reasons.
  - If more time is needed (complex or legal issues), an interim update with expected resolution timeline must be sent
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## 8. Appeal Mechanism

- If dissatisfied with CRO decision/rejection, complainant may appeal to CRAO **within 21 days** from receipt of decision.
  - CRAO must resolve the appeal within **30 days** from filing.
  - If still unresolved, complainant may escalate to **IFSCA** (via grievance-[redressal@ifsc.gov.in](mailto:redressal@ifsc.gov.in)), preferably within **21 days**, after exhausting internal appeal
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## 9. Record-Keeping & Retention

Maintain comprehensive records for each complaint:

1. Complaints received & processed
  2. Correspondence with complainants
  3. Documentation & details relied upon
  4. Final decisions – resolution or rejection (with reasons)
  5. Timelines associated
- These records must be maintained electronically and retained for at least **6 years** from resolution or longer if legal proceedings are pending.
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#### **10. Reporting & Disclosure**

- Publish a section titled “**Complaint Handling and Grievance Redressal**” in the annual report displaying complaint statistics (received, resolved, rejected, pending).
  - If no annual report is required, display the information annually on the corporate website or dedicated webpage of group entity under the same heading
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#### **11. Online Complaint System (Optional)**

Depending on the growth and volume of the company an online complaint submission and tracking system may be developed in future for ease of use and transparency

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#### **12. Role of Compliance Officer & Governance**

- Compliance Officer oversees adherence to policy and timelines and proper function of CRO/CRAO roles.
  - Board reviews Policy at least **annually** or as triggered by regulatory changes, internal feedback, or audit findings.
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#### **13. Policy Review & Version Control**

- This Policy shall be reviewed and updated periodically.
  - Maintain version control: include version number, approval date, revision summary, and next review date.
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