

## **COMPLAINT HANDLING AND GRIEVANCE POLICY- GIFT CITY UNIT**

### **1. Preamble:**

The Complaint Handling and Grievance Redressal of Catalyst Trusteeship Limited's (Catalyst) GIFT City Branch is designed to uphold high standards of client service and regulatory compliance, ensuring prompt, fair, and transparent resolution of client and beneficiary grievances. Aligned with IFSCA regulations, the policy outlines a structured framework for complaint receipt, acknowledgment, resolution timelines, appeal procedures, and record keeping. The said policy stands effective from April 2025.

### **2. Regulatory Requirements / References:**

- International Financial Services Center Authority (IFSCA) Regulations, 2019 including amendments as and when applicable.
- IFSCA (Capital Market Intermediary) Regulations, 2021 including any amendments.
- IFSCA dated December 02, 2024 - circular on Complaint Handling and Grievance Redressal by Regulated Entities in the IFSC, including any amendments issued from time to time.

### **3. Category/ Types of Complaints:**

#### **➤ Indicative list of complaints is given hereunder:**

- i. Non receipt of due interest/ redemption by Lender/ investor
- ii. Non creation or inordinate delay in creation of security
- iii. Breach of covenants/ terms of issuance or underlying transaction documents
- iv. Delay or non - cooperation in providing reports/data/information for the investors Lenders.
- v. Delay in finalization/ execution of documentation.
- vi. Unprofessional or unsolicited behaviour of an employee
- vii. Delay in processing requests for issuance of NOCs / Convening of Meetings etc.,
- viii. Non submission/delay in providing the documents/data required by the Lenders/ Investors.
- ix. Other service issues.

#### **➤ Matters that are not considered as complaints by Catalyst - Gift City Branch t**

- i. Anonymous complaints (except whistleblower complaints)
- ii. Incomplete or un-specific complaints
- iii. Allegations without supporting documents
- iv. Suggestions or seeking guidance/explanation
- v. Complaints on matters not relating to the financial products or services provided by the Regulated Entity
- vi. Complaints about any unregistered/ un-regulated activity
- vii. References in the nature of seeking information or clarifications about financial products or services

**4. Applicability:** This policy is applicable to all offices, all services rendered by the Gift City Branch and all personnel working at the offices of Catalyst Gift City Branch.

**5. Objective:** To ensure that complaints are resolved in a time-bound and efficient manner with the aim of promoting high standards of client service and ensuring client satisfaction. Complaint records shall be maintained in electronic retrieval form.

- 6. Receiving a Complaint:** All complaints are to be directed to the Complaints Redressal Officer (CRO). The dedicated mail ID for this purpose is [grievance.giftcity@Catalysttrustee.com](mailto:grievance.giftcity@Catalysttrustee.com), which shall also be made available on CATALYST website.

In case grievances/complaints are received or raised with any other department, the same shall be forwarded to the Complaints Redressal Officer (CRO) with copy to the Chief Compliance Officer on the same day.

**7. Complaints Redressal Officer (CRO) & Complaints Redressal Appellate Officer (CRAO).**

- Compliance Redressal Officer (CRO) shall be the Compliance Officer - GIFT City / Employee of Catalyst – Gift City Branch responsible for handling of complaints.
- Complaint Redressal Appellate Officer (CRAO) shall be a senior level person (i.e. Chief Compliance Officer) of the Regulated Entity Designated for handling appeals against the decision taken by the Complaint Redressal Officer of Catalyst.

**8. Responsibility of the Complaints Redressal Officer (CRO)**

The CRO along with the dealing officer of the concerned Servicing /Operation/ relevant team will ensure that all the complaints received are resolved within the prescribed regulatory timeline.

If the complaint is lodged against the Issuer of debt securities, the same should be forwarded immediately to the CRO. The dealing officer for the issuer should be contacted by the CRO on the same day for priority resolution with such Issuers.

The dealing officer shall strive to get resolution of the complaint by constant communication with the Issuers within 15 days of the receipt of Complaint but not later 30 days of acceptance of complaint. Where the complaint like non-payment of interest / redemption amount or non-creation of security cannot be resolved within reasonable time, the beneficiary/client must be advised suitably.

**9. Appeal Mechanism**

If a complainant is not satisfied with the resolution provided by the Regulated Entity or if the complaint has been rejected by the Regulated Entity, the complainant may file an appeal before the CRAO of the Regulated Entity preferably within 21 days from the receipt of the decision from the CRO. The CRAO shall dispose of the appeal within a period of 30 days.

Where a complainant is not satisfied with the decision of the Regulated Entity and has exhausted the appellate mechanism of the Regulated Entity, he may file a complaint before the Authority through email to [grievance-redressal@ifsc.gov.in](mailto:grievance-redressal@ifsc.gov.in) preferably within 21 days from the receipt of the decision Catalyst.

**10. Time Frame for resolution of complaints/grievances**

On receipt of a complaint, CRO of the Regulated Entity shall make an assessment on the merits of the complaint. Pursuant to assessment

- In case of acceptance, the Catalyst shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
- In case of non-acceptance, the Regulated Entity shall inform the complainant within 5 working days along with reasons.

- The Regulated Entity shall dispose of complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint. The Regulated Entity may either resolve the complaint or reject the complaint.

#### 11. Disclosure on website

This policy be prominently displayed on the website of Catalyst under the heading "Complaint Handling and Grievance Redressal". The name and contact details of the 'Complaint Redressal Officer' and the "Complaint Redressal Appellate Officer" shall also be prominently displayed on the website.

#### 12. Maintenance of records:

The CRO is responsible to ensure that all complaints received are recorded. The copy of the complaints along with copies of all relevant documents shall be maintained by the CRO. The confirmation of resolution of complaint, if any, be sent to the complainant.

Further, Catalyst shall maintain all records relating to complaint handling including the following:

- i. Complaints received and processed
- ii. All correspondence exchanged between Catalyst and the Complainants
- iii. All information and documents examined and relied upon by Catalyst while processing of Complaints
- iv. Outcome of the Complaints
- v. Reasons for rejection of Complaints, if any
- vi. Timelines for processing of Complaints; and
- vii. Data of all Complaints handled by it

#### 13. Compliance Officer Role: Compliance Officer of Catalyst – Gift City Branch shall ensure that handling and disposal of complaints are in accordance with the regulatory requirements specified by IFSCA.

Further, the responsibilities on any other employee such as the Principal Officer w.r.t grievance redressal shall continue to apply as per the applicable IFSCA regulations & circulars.

#### 14. Miscellaneous: The compliance requirements under this circular are in addition to the requirements on grievance redressal contained in any other regulations specified by the Authority. Where any provision of this circular is in contradiction with any provision of the applicable Act, Rule or Regulation, the provisions of the said Act, Rule or Regulation shall prevail.

#### 15. Review of the Policy: This policy shall be reviewed every 3 years by the Compliance Officer or whenever changes mandated as per regulations / circulars and shall be placed before the Board for approval.

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