



Elara Securities (India) Private Limited (ELARA or ESPL)

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POLICY & PROCEDURE FOR COMPLAINT HANDLING

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Version Control Matrix

Name of the Document	POLICY & PROCEDURE FOR COMPLAINT HANDLING
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Version Tracking

Version	Date of creation/ update	Prepared By:	Approved By:	Summary of Changes:	Board Approval on
V1	30.12.2009	Rashmi Deshpande	BOD	Initial	30.12.2009
V2	12.02.2010	Rashmi Deshpande	-	Review & Update	-
V3	31.12.2010	Rashmi Deshpande	-	Review & Update	-
V4	24.01.2013	Jayant Prakash / Anand Rao	-	Review & Update	-
V5	13.03.2014	Jayant Prakash / Anand Rao	BOD	Review & Update	28.03.2014
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1. Introduction:

Elara Securities (India) Private Limited (hereinafter referred to as “Elara”) has an established mechanism for investor service and grievance handling, the Compliance Officer appointed by Elara for this purpose, being the important functional node.

All client or third party complaints are directed in the first instance to Elara’s Compliance Officer. Elara will endeavour to resolve the complaint. Upon resolution of the complaint, Elara will send a final response letter, which sets out the nature of that resolution and any applicable remedy. If for any reason, the complainant is dissatisfied with Elara’s final response, he / she / they are entitled to refer complaint to the investor grievance cell of the respective stock exchange or the Securities and Exchange Board of India (SEBI) - Investor Grievance Cell.

Being SEBI registered stock broker with National Stock Exchange of India Limited (NSE) and BSE Limited (BSE) and Depository Participant with Central Depository Services (India) Limited (CDSL), Elara would seek to redress the investor grievances as expeditiously as possible.

2. Compliant Handling Procedure

2.1 Reporting

- Elara has a designated email id investor.grievances@elaracapital.com for handling investor grievances (IG) on which the investor can make a complaint. This e-mail ID is mentioned on various communication being made by Elara such as Account Opening Forms, Contract Notes, Notice Board displayed in Company premise(s) etc. Grievances sent on this e-mail id are auto-forwarded to the Compliance Team as well as the Designated Director & CFO.
- An Investor can also make a written complaint through letter addressed to Elara’s office or recording the same in the physical register or Fax the complaint on +91 22 6164 8569 or Telephone +91 22 6164 8500 or directly by the aggrieved investor to the respective stock exchange, depository on

Exchange	Website	Contact No.	E-Mail ID
BSE Limited (BSE)	www.bseindia.com	+91 22 2272 8097	is@bseindia.com
National Stock Exchange of India Limited (NSE)	www.nseindia.com	+91 22 2659 8190	ignse@nse.co.in
Central Depository Services (India) Limited (CDSL)	www.cdslindia.com	1800 22 5533	complaints@cdslindia.com

- Or on SEBI Complaints Redress System (SCORES) (SEBI vide Ref. No. SEBI/HO/MIRSD/MIRSD6/CIR/P/2017/20, dated March 10, 2017 and SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023) Website: <https://scores.sebi.gov.in> or on Toll Free Helpline No. 1800 22 7575 / 1800 266 7575. Grievances received in such mode will be updated in the Complaint Tracker / Investor Grievance Register (Physical Register) by Compliance Officer who will ensure that all relevant fields are filled. The template of Physical Register is mentioned in Annexure A.

2.2 Acknowledgement to Complainant

- A correspondence either by letter or E-mail is to be made with the investor who has submitted a written complaint acknowledging receipt of the complaint within 24 hours of subsequent business day.

2.3 Assessment / Investigation

- Compliance Officer shall obtain all information available on the complaint which is considered necessary for a proper investigation. It will look into all the necessary information and undertakes to resolve them as soon as possible. Full details of the complaint are thereafter informed by the Compliance Officer to the Respective Department Officer in the Company as soon as the complaint is received.
- Respective Department Officer identifies whether support from other Departments is required to resolve the said complaint. In case support is required from the other Departments, then the Respective Department Officer shall send the details of the said complaint to the concerned Department and follow-up with them till all the details for resolving the complaint are received in completeness.
- Respective Department Officer shall then send the reply of the complaint received to the Compliance Officer via e-mail once the same is resolved.
- Compliance Officer will verify the reply received from Respective Department Officer.
- If Compliance Officer is not satisfied with the reply then will do further follow up with Respective Department Officer and take prudent steps to resolve the said complaint.

3. Response to Complainant

- If Compliance Officer is satisfied that no further investigation is required, then the reply for those complaints would be done through the registered Email or Letter or SCORES (for complaints received through SCORES) and acknowledging receipt of reply from the investor.
- Compliance Officer to update the Complaint Tracker sheet / IG Register for date of resolving and status of complaint.
- Elara endeavours to address and resolve all complaints received from an aggrieved investor with 10 working days of receipt of the complaint or within such other time frame prescribed under the regulatory framework, whichever is earlier.

- Status of redressal of complaints received from BSE, NSE and CDSL is informed to them through Letters / email and if any telephonic enquiry is received from them, full details of the case and status of redressal are provided over phone.
- Details of the complaints received (resolved and open), if any, shall also be placed before the Board of Directors of the Company for information and record.

4. Annexure A:

Template of Physical Investor Grievance Register



Investor Grievance
Register_28_2_2018