

Policy on Complaint Handling and Grievance Redressal

(Version 1.1)

Policy on Complaint Handling and Grievance Redressal

1. Introduction

This policy outlines the procedures for handling complaints and addressing grievances raised by stakeholders (investors, clients, other market participants or any other person on any matter having a bearing on the activities of the intermediary) of CareEdge Global IFSC Limited ("CGIL"), a Public Limited Company incorporated under the Companies Act, 2013 and is a Capital Market Intermediary as a Credit Rating Agency registered with International Financial Services Centres Authority ("IFSCA").

The policy is in line with the requirements set out by International Financial Services Centres Authority (Capital Market Intermediaries) Regulations, 2021 and International Financial Services Centres Authority ("IFSCA") circular dated December 2, 2024, and aims to ensure an efficient, transparent, and fair mechanism for redressing complaints.

2. Objective

The primary objectives of this policy are:

- To provide a transparent and accessible mechanism for stakeholders to lodge complaints.
- To address grievances promptly and fairly.
- To ensure compliance with the regulatory framework established by IFSCA for complaint handling.
- To uphold the highest standards of corporate governance and customer service.

3. Scope

This policy applies to all complaints and grievances raised by stakeholders in relation to the services provided by CGIL, including but not limited to Credit Rating services, regulatory compliance and operational matters.

4. Definition of Complaint

A complaint is any communication from a stakeholder expressing dissatisfaction with the services, actions or lack thereof by CGIL, which requires an investigation or resolution under this policy. The complaint can constitute the following:

- Credit Rating Services: Concerns regarding the Rating process, methodologies or the outcomes of credit ratings provided.
- Regulatory and Compliance Issues: Allegations of non-compliance with applicable laws, regulations or statutory requirements.
- Customer Service: Complaints about poor service, unprofessional conduct or delays in addressing requests or inquiries.
- Operational Issues: Any other operational matters that impact the quality of services provided or the interests of stakeholders.

5. What Does Not Constitute a Complaint

As per **Schedule I** of the IFSCA Circular dated December 2, 2024, the following do not constitute a complaint:

- Anonymous complaints (except whistleblower complaints).
- Incomplete or un-specific complaints.
- Allegations without supporting documents.
- Suggestions or seeking guidance/explanation.
- Complaints on matters not relating to the financial products or services provided by the Regulated Entity.

- Complaints about any unregistered/ un-regulated activity.
- References in the nature of seeking information or clarifications about financial products or services.

6. Cross Border Operations

Cross border operations of CGIL entail provision of services to its customers having presence outside India. CGIL is committed towards highest standards of integrity in conducting its business with its clients. Accordingly, CGIL prescribes that any client, investor or stakeholder may submit its grievance or complaint, in relation to any services/ products offered by CGIL or any terms of the agreement to which CGIL is a party.

7. Complaint Redressal Mechanism

The following process outlines the steps for lodging, processing, and resolving complaints:

- i) Lodging a Complaint:** Complaints may be lodged by any stakeholder (clients, issuers, investors, etc.) through writing an Email to the Complaint Redressal Officer (CRO).
- ii) Acknowledgment of Complaints:** Upon receipt of a complaint, the CRO will conduct a thorough assessment of the complaint's merits to determine its validity and whether it falls within the scope of the entity's grievance redressal policy. Based on this assessment, the following actions will be taken:
 - **In Case of Acceptance:** If the complaint is found to be valid and accepted for further action, the Regulated Entity shall acknowledge the acceptance of the complaint in writing. This acknowledgment will be provided to the complainant within 3 working days of receipt of the complaint.
 - **In Case of Non-Acceptance:** If the complaint is deemed invalid or outside the scope of the grievance redressal process, the Regulated Entity will notify the complainant in writing. The complainant will be informed of the non-acceptance of the complaint within 5 working days of receipt, and the notification will include the reasons for the non-acceptance.
- iii) Investigation and Resolution**
 - The Company will investigate the complaint in a fair, transparent, Professional and impartial manner.
 - The investigation will typically be disposed of the complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint.
 - The complainant will be provided with a resolution or an update on the status of the complaint.
 - In case of rejection of a complaint, complainant will be provided with reasons for rejection of the complaint, in writing.
- iv) Resolution of the Complaint:** After thorough investigation, the CGIL will provide the complainant with a resolution.
- v) Appeal before Complaint Redressal Appellate Officer (CRAO):** If the complainant is not satisfied with the resolution or if the complaint has been rejected, the Complainant may appeal before the CRAO 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.

8. Designated Officers for Handling Complaints

To facilitate the complaint handling process, the following officers are designated:

Complaint Redressal Officer (CRO):

Name: Niren Desai	Email: complaints@careedgeglobal.com
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Complaint Redressal Appellate Officer (CRAO):

Name: Nitesh Jain	Email: nitesh.jain@careedgeglobal.com
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9. Records and Documentation

- All complaints, their outcome, information, documents and related correspondence will be maintained in CGIL's records in electronic retrieval form for at least six years from the date of disposal of complaint.
- For any pending litigation or legal proceeding relating to the complaint, the record shall be maintained for the applicable period, after final disposal of the proceeding.

CGIL is committed to ensuring that complaints are handled fairly, efficiently and in accordance with regulatory requirements. This policy is a vital part of our commitment to upholding the integrity of our services and maintaining the trust of our stakeholders.

DOCUMENT CHANGE CONTROL

Version	Author	Date	Outline of changes
1.0	Compliance Officer	17/10/2024	Policy on Handling Cross Border Complaints
1.1	Compliance Officer	10/10/2025	The existing Policy on Handling Cross Border Complaints has been revised and renamed as Policy on Complaint Handling and Grievance Redressal in line with the framework prescribed under the IFSCA Circular.