Policy on Investor Complaints Handling

Purpose

This policy sets forth the procedures InGovern Proxy Advisory Services follows for receiving, registering, addressing, and resolving investor complaints. The objective is to ensure fair treatment, prompt response, regulatory compliance, and to uphold market integrity and client trust.

Scope

This policy applies to all investor complaints received by InGovern Proxy Advisory Services, whether related to proxy advisory recommendations, research analyst activities, service interactions, disclosures, or other business operations.

Regulatory Compliance

- InGovern undertakes to comply with relevant provisions under the Securities and Exchange Board of India (SEBI) regulations applicable to research analysts and proxy advisory firms.
- Complaints will be addressed in accordance with SEBI circulars, including reporting formats and timelines as specified by the regulator.

Receipt and Registration of Complaints

- Investors may submit complaints via email, web portal, post, or other prescribed channels.
- Each complaint is promptly acknowledged and registered in the centralized complaints database within one working day of receipt.
- Details captured include complainant's name, contact information, complaint nature, relevant report or recommendation, and supporting documents.

Grievance Redressal Process

- Complaints are initially screened by the Compliance Officer for validity and categorization.
- A responsible staff member is assigned to investigate and draft a response, with oversight from the senior management team if required.
- InGovern aims to resolve complaints within 7 working days; issues requiring further investigation may take up to 21 working days, with interim updates provided to the complainant.

Escalation and Review

- If the complainant is unsatisfied with the initial resolution, an escalation process is available, whereby the complaint is reviewed by the senior management or the designated Grievance Redressal Committee.
- Final resolutions are communicated promptly, with detailed reasoning and remedial steps if applicable.

Disclosure and Reporting

- Monthly summaries of investor complaints received, addressed, and pending shall be disclosed as required by SEBI guidelines.
- Data on complaints is maintained and reported in the prescribed format, including nature, status, and turnaround times, for regulatory review.

Record Keeping

- All complaints and actions taken are documented and retained for a minimum period of five years, subject to statutory requirements and audit trails.

Confidentiality

- InGovern treats all complaints and related communications confidentially, ensuring that personal information is not disclosed except as required by law or regulatory authorities.

Policy Review

- This policy must be reviewed annually or whenever required by regulation to ensure continued compliance, transparency, and effective grievance handling.

Last updated on 8th October 2025