



POLICY ON HANDLING CUSTOMER GRIEVANCE

(Effective from April 1, 2022)

(Version 2 w.e.f. August 21, 2023)

LGT Wealth India Private Limited

[CIN: U65990MH2021FTC365012]

Registered office:

7th Floor, A Block, Shiv Sagar Estate, Worli, Mumbai – 400018

1) Purpose:

- The purpose of this policy is to enable LGT Wealth India Private Limited and its subsidiaries (hereinafter collectively referred to as “LGT Wealth/ Company”) to redress Client’s issue (“Complaint”) in a timely manner, take necessary steps and respond to the client in a satisfactory manner.
- This policy describes the process for the handling and monitoring of Client complaints including escalations and monitoring thereof.

2) Scope:

- This policy applies to LGT Wealth India Private Limited and its subsidiaries.
- This policy covers all and any complaints filed/raised by clients (or prospects) and/or their representatives (e.g. power of attorney holder, legal representative, intermediaries), whether received directly or through SCORES Portal or from SEBI or any other regulatory authorities, as the case may be.
- Complaint may be received in writing (including email and/or fax) or through oral statement from the client, or any person acting on behalf of a client, or from the regulators alleging a grievance/ dissatisfaction of the client in relation to the service rendered by LGT Wealth.

3) Complaint Vs. other Client communication:

- A client complaint exists in cases where the client expresses dissatisfaction regarding services rendered by the Firm and/or makes proposals for improvements. A complaint always includes an element of expressed dissatisfaction regarding products and services rendered by the Company.
- Mere proposals, suggestions for improvements are not considered as complaints in the context of this policy and are therefore out of scope.
- Similarly, Company regularly receives various requests from the clients relating to the service availed. Such service requests are not considered as complaints in the context of this policy and are therefore out of scope.

4) Classification of complaints:

“**Serious**” complaint: A complaint is classified as serious if one or more of the following criteria are met:

- Complaint is addressed to one of the following (respectively to the local equivalent):
 - Regulator (SEBI, RBI, BSE, NSE, NSDL, etc)
 - Local Board of Directors (“BoD”)

- General Counsel, or Legal department and includes an explicit threat to escalate the topic to one of the following:
 - ✓ Regulator
 - ✓ Media / press
- Any arbitration authority
- Lawyer
- includes an announcement/threat that the complainant will make a legal claim or includes obvious respective indications.
- includes an obvious indication for serious misconduct such as fraud, money laundering, bribery, market manipulation, regulatory breaches, or for serious suitability violations.
- Financial impact is estimated to likely exceed INR 1,00,000 (or equivalent) at first sight.
- Any other reason justifying a “serious” classification, at the discretion of the Compliance Officer or case owner.

“Other” complaint: Any complaint not classified as serious according to the above definition.

5) Re-classifications:

If a complaint is re-classified during the resolution process, it must be handled according to its latest classification.

6) Process for Complaint Handling:

- As per regulatory mandate, the complaints must be resolved promptly but not later than 21 (twenty-one) calendar days from the date of its receipt. The complaint should be acknowledged within 3 working days from the date of receipt of the same. If the resolution takes more time, then a progress report shall be sent to the complainant with a tentative timeline.
- In case additional information is requested, then the same should be sought within 7 days from the receipt of the complaint. In such case, the 21 calendar days will commence from the date of receipt of the additional/latest information.
- The Company shall put in place a grievance redressal mechanism (Appendix 1) giving the contact details of resolution officials including escalation for unresolved/not responded cases.
- Endeavor shall be made to inform the Clients about the redressal procedure and the same shall be disclosed on the website of the company, for the benefits for the Clients.

- Any employee who comes across/receives a written or an oral complaint (whether or not such client is mapped to that employee) should immediately escalate the same, preferably on the same or next working day, to his/her Manager and forward the same to grievances@lgtindia.in.
- Compliance will monitor the complaints and will escalate the same to the relevant functions for a quick resolution.
- The concerned RM, Zonal Manager and Compliance will discuss the complaint to determine the appropriate course of action.
- Any kind of settlement/compensation to the client must be approved by the CEO and COO.

7) General guidelines relating to Client Communication:

Without prejudice to the code of conduct and other policies applicable from time to time, employees shall comply with following, while dealing with clients:

- Not to send any response (oral or in writing) except for acknowledgement or provide any document to the client without consulting Compliance.
- Not to admit any breach, wrongdoing or try to reach any settlement with the client (verbal or in writing) without first discussing with the manager and Compliance.
- Not to handle the complaints alone.

8) Uploading on Scores System:

- In case of complaints received through the SEBI SCORES system, the Action Taken Report (ATR) along with the relevant details/supporting documents of the grievance should be properly uploaded on SCORES, within the prescribed timeline.
- Any changes or modification to be made to the SCORES system will be done by Compliance. Compliance will ensure that the details uploaded on the SCORES are complete and accurate.

9) Monitoring and Reporting:

- A complaint Register recording details of the complaint including the date of receipt and resolution etc., shall be maintained in the format as per Appendix 2.
- The Compliance Officer shall present a quarterly MIS relating to the customer complaints and its latest status to the Board of Directors.

10) Archiving of complaints:

The Copy of each complaint along with the supporting documents and the replies thereto shall be preserved for future reference.

Appendix 1

Grievance Redressal Mechanism

For any complaint, dispute regarding service or matter related thereto, the Client shall follow below escalation matrix.

1. Concern relationship manager (RM) shall be the first point of contact with whom the Client shall discuss his concern/issues in full detail.
2. If no satisfactory response is received from the concerned RM or if the complaint is against the concerned RM, then the Client can lodge a formal complaint by writing to the grievance cell on grievances@lgtindia.in
3. If no response is received within 21 calendar days from the date of lodgment of complaint with the grievance cell, or if the Client is still not satisfied with the resolution, then he/she may write to Mr. Surendhren Manayath, Whole-time Director directly on Surendhren.manayath@lgtindia.in
4. In case the Client is not satisfied with the redressal by the Portfolio Manager, he may lodge a complaint on SEBI's web-based complaints redress system (SCORES). The link to access SCORES is <http://scores.gov.in>. The Client can file complaints by clicking "Complaint Registration" under "Investor Corner".

Appendix 2

Complaint Register

S L . N o .	Name of the Com plain ant	Date of rece ipt of Com plia nt	Classifi cation (Seriou s/Other s)	Ref erre d by	Resp onsib le Depa rtme nt	Deal ing emp loye e	R ep ly da te	Res oluti on date	Status (Pending/Re plied/Resolv ed