



POLICY ON HANDLING CUSTOMER GRIEVANCE

LGT Wealth India Private Limited

[CIN: U65990MH2021FTC365012]

Registered office:

414,16/1 to 24 & 17, B Wing, Comm. Building,
Kanakia Wall Street, Near Chakala Signal, JB Nagar,
Andheri East, Mumbai – 400093, Maharashtra

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) 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.

3) 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.

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 has to be handled according to its latest classification.

6) Process for Complaint Handling:

- The Company shall put in place a grievance redressal mechanism (**Appendix 2**) giving the contact details of resolution officials including escalation for unresolved/not responded cases for time bound resolution. Endeavor shall be made to inform the Clients about the complaint lodgment 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 working day, to his/her Supervisor, Business Manager, Client Relationship Manager and Compliance with all the relevant details/enclosures.
- There could be situations where the client complains to SEBI/Stock Exchanges/ Depository, and LGT Wealth may receive the complaint directly from such institutions. In such cases, the matter must be escalated immediately to Compliance. As per regulatory mandate, such complaints must be resolved within 30 days of receipt of such complaints. Otherwise, the appropriate rationale has to be recorded.
- There could be situations where client interactions may fall into a grey area which will require sound judgment in deciding as to whether or not something is a complaint. In that situation, the employee receiving the communication shall forward the same to his supervisor/business Manager with a copy to compliance.
- In case any employee fails to escalate any complaint on the same working day, then his/her Supervisor shall identify the reasons for the same and take appropriate corrective actions so that such instances are not repeated in future. Also, the Supervisor shall immediately escalate the matter to Business Manager, Client Relationship Manager and Compliance.

- Compliance will monitor the complaints received from any regulators, logged in the SEBI SCORES system/received from Stock Exchanges/ Depository and will escalate the same to the relevant functions for quick resolution.
- The responsible Relationship Manager (in case of Advisory Division) and the Client Relationship Manager has the primary responsibility to settle the complaint in an efficient and professional manner. In case of Loan Business, the Business Head handling the loan business / Head of Credit Origination will be responsible for resolution of the complaint.
- In principle, the complaint has to be acknowledged / answered, in written form, within 5 working days at the latest (in case of serious complaint). In case the complaint cannot be settled immediately, a confirmation of the receipt of the complaint and if available a progress report has to be forwarded to the client. Such letters to the client have to be signed by the Head of the responsible department and Head of Wealth Management.
- RM, Zonal Head, Business Manager, Client Relationship Manager and Compliance will discuss the complaint to determine the course of action to be taken.
- All Complaints, received directly by the Company, should be resolved within 30 days from the date of receipt or logging of complaint. Else, proper reason has to be recorded as in the Complaint's Register as to why the matter was not resolved within 30 days. However, for all complaints received directly from the SEBI SCORES system or from NSDL, should be mandatorily closed within 15 days of receipt. In case additional information is to be sought from the Complainant then the same should be sought within 7 days from the receipt of the complaint. In such case the 15 days period will commence from the date of receipt of the additional information.
- The Compliance Officer shall ensure that the complaint is acknowledged and resolved as per this Policy within the stipulated time as well as maintenance of the Complaints Register.
- Any response to the client has to be reviewed and approved by Legal & Compliance.
- In replying to the complaint, the following items have to be considered:
 - Legal & Compliance has to be involved in case where the client makes any kind of claim or requests compensation or when regulatory or litigation risks are at stake.
 - An objective, issue-related and not one-sided assessment of the complaint has to be ensured.
 - All matters and concerns of the client have to be responded.
 - An objective correct statement has to be formulated in a comprehensible and traceable language.
 - Apologize and communicate a fair attitude for errors made, if any.
 - Prevent further damages by taking immediate measures.
- Any compensation to the client has to be approved by the CEO.
- Compliance shall update the Complaints Register with the resolution status.

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) or provide any documentation to the client without consulting the Supervisor, Business Manager and Compliance.
- Not to admit any breach, wrongdoing or try to reach any settlement with the client (verbal or in writing) without first discussing with manager and Compliance
- Not to try to handle the complaints alone.

8) Uploading on Scores System:

- In case of complaints received through the SEBI SCORES system, Compliance shall update the Action Taken Report (ATR) along with supporting documents, if any electronically in SCORES. ATR in the physical form need not be sent to SEBI. The proof of reply to the concerned investor/client should also be uploaded in SCORES and preserved for future reference.
- The relevant details/supporting documents of the grievance should be properly uploaded on the SCORES, within the prescribed timeline. The complaint shall be treated as resolved/disposed/complete only when SEBI closes/disposes the complaint in SCORES.
- Any changes or modification to be made on the SCORES system will be done by Compliance. Compliance will ensure from time to time that the details uploaded on the SCORES are complete and accurate.

9) Monitoring and Reporting:

- Compliance shall maintain the complaint Register in the format prescribed in Appendix 1. All complaints received and resolution status shall form part of the SEBI mandated half yearly internal audit.
- The Compliance Officer shall send a quarterly MIS report to the Board of Directors about the complaints received/resolution status.
- Complaints will be quarterly reported in the quarterly "Operational Risk Report of LGT Wealth India Private Limited" prepared by Business & Operational Risk.

10) Archiving of complaints:

The original complaint and a copy of the answer must be archived by the Relationship Manager into Documentum.

Appendix:

Appendix 1: Format of Complaints Register

Appendix 1

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

Appendix 2

Grievance Redressal Mechanism

For any complaint, dispute regarding service or matter related thereto, the Client is requested to follow below escalation matrix for enabling the company to resolve the issues, if any, as expeditiously as possible.

1. Client may connect with the concerned relationship manager (RM) who is acting as point of contact at the time of complaint.
2. If no response is received within 7 days of the date of the complaint or the customer is not satisfied with the response of the RM or if the complaint is against the concerned RM, then the Client can escalate the issue before the compliance officer on grievances@lgtindia.in
3. If no response is received within 15 days from the date of first lodgment of complaint with the concerned RM or the Client is not satisfied with the response received, He may approach Mr. Surendhren Manayath, Whole-time Director at Surendhren.manayath@lgtindia.in
4. In case the Client is not satisfied with the redressal by the Portfolio Manager or otherwise within 30 days from the date of first lodgment of complaint with the concerned RM, He may lodge a complaint on SEBI's web-based complaints redress system (SCORES). The link to access SCORES is <http://scores.gov.in/> and investors can file complaints by clicking "Complaint Registration" under "Investor Corner".