Hedge Equities invest with an edge

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HEDGE EQUITIES LIMITED

GRIEVANCE REDRESSAL POLICY

INTRODUCTION

Hedge Equities Limited (hereinafter referred to as 'HEL') is registered with the Securities and Exchange Board of India (SEBI) as a Portfolio Manager under the SEBI (Portfolio Managers) Regulations, 2020, offering Discretionary Portfolio Management Services and as a Research Analyst with SEBI Registration No. INH000004398.

This grievance redressal policy outlines the structured framework for handling grievances related to Portfolio Management Services (PMS). Investor inquiries and complaints are a significant voice for the Investors and a prompt and effective service is crucial for maintaining the existing relationship. HEL has established principles and a framework to handle both queries and grievances to ensure that:

a. All Investors are treated fairly

b. Complaints raised by Investors are dealt with courtesy and in a timely manner

c. Investors are provided with information on how to raise their issues and complaints and escalate if they are not satisfied with the resolution or handling.

d. A dedicated Customer Services Team is in place to handle customer queries and complaints. The process is supervised by a senior resource.

GRIEVANCE RAISING MECHANISM

Investors are entitled to make a complaint in writing, orally or telephonically directly to HEL. In addition to this, Investors that are serviced by their independent advisors or distributors can also raise their complaints through their advisors and distributors.

1. It is mandatory for the Investor having any grievance to take up the matter directly with HEL in the first place.
2. For complaints the Investors can directly reach HEL through email at ops@hedgegroup.in or through telephone on 0484-6130436.
3. Investors can also send a letter to HEL at the following address: Hedge Equities Limited, Hedge House, Mamangalam PO, Palarivattom, Ernakulam 682025 Kerala.
4. HEL shall endeavour to redress the Investor complaint(s) within 21 (twenty-one) calendar days from the date of the receipt of the complaint.
5. If Investors are not satisfied with the response from HEL, they can lodge their grievances with SEBI Complaints Redress System (SCORES) at https://scores.sebi.gov.in/ . The complaint shall be lodged on SCORES within one year from the date of cause of action, where the complainant has approached HEL, for redressal of the complaint and

   • HEL has rejected the complaint or,
   • The complainant has not received any communication from HEL or,
   • The complainant is not satisfied with the reply received or the redressal action taken by HEL.
6. HEL shall submit an Action Taken Report ("ATR") on SCORES within 21 Calendar days from the date of receipt of the Compliant on the SCORES Portal. If the Investor is not satisfied with the Redressal or no ATR has been filed within the above mentioned timeline by HEL, then the client can opt for 1st review within 15 days. Thereafter, the complaint shall be escalated to

the Designated body. SEBI has appointed Association of Portfolio Managers in India (APMI) as the Designated body for Portfolio Managers.

7. The Designated Body shall seek clarification from HEL or the Investor, as required. Once the designated body has received the clarification then they shall upload the revised ATR on SCORES within 10 days.
8. If the Complainant is not satisfied with the 1st review or ATR is not uploaded by the designated body in 10 days, then the Complainant can opt for 2nd review within 15 days. Thereafter, the complaint shall be escalated to a supervising official or the dealing officer of SEBI and they shall seek clarifications from SAMC or the Investor for the same.
9. If satisfied, SEBI shall dispose the complaint with reasonable closure remarks and if not satisfied then SEBI shall advise the Investor to opt for Online Dispute Resolution by registering the compliant on the Online Dispute Resolution Portal ("ODR Portal") at https://smartodr.in/login
10. Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with HEL is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.
11. The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration under the SCORES guidelines, or not pending before any arbitral process, court, tribunal or consumer forum, or is non-arbitrable in terms of Indian law.
12. For more details on the process on Online Dispute Resolution Mechanism, please refer SEBI circular no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/145 dated July 31, 2023 (Updated as on August 4, 2023) titled "Master Circular for Online Resolution of Disputes in the Indian Securities Market".

RESOLUTION OF COMPLAINTS

Responsibility

- Primary responsibility is with the Investment Relation Officer to resolve the complaint for which he/she would liaise with the other relevant departments (like, Operations, Accounts, Compliance, Research etc.).
- If the issue cannot be resolved by the Investment Relation Officer, the same will be escalated to compliance officer or the Director, Operations of the company.
- All complaints received shall be recorded internally including how the same has been resolved.

TIME FOR RESPONSE

General Turn Around Time (TAT) for response to complaint is:

- Cases involving third party- 10 working days
- Scores related complaints: As specified by the regulator from time to time
- ODR related complaints: As specified by the regulator from time to time

CLOSURE OF COMPLAINTS

A complaint shall be considered as closed when:

- The Company has addressed the grievance of the complainant fully
- Where the Company has responded to the complainant in writing
- Where the complainant has not responded to the Company within 4 weeks of the Company's written response.
- Where the client comes back with the same matter after it has been closed, or with a related matter, a new grievance should be registered to enable proper tracking.

REVIEW

The Board of directors of the Company shall periodically review the Customer Grievance Redressal Mechanism to ensure that process deficiencies, if any, are addressed. The Board shall also periodically review the Statement of Complaints received, resolved and pending, along with reasons for the same.

The above policy is placed before the Meeting of the Board of Directors of the Company dated 21st April, 2026 and duly approved.

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