

## ALPHAGREP'S CUSTOMER CARE AND GRIEVANCE ESCALATION MATRIX

AlphaGrep is committed to ensuring that all investor complaints are **acknowledged promptly, addressed in a time-bound manner, and resolved in a fair and transparent manner.**

Investors can lodge complaints or grievances relating to demat accounts and DP services through the following channels.

### Contact Details for Lodging Complaints

➤ **Level-1 | Company's Customer Support**

**Availability: Monday to Friday: 9:00 AM to 6:00 PM**

Level	Contact Person	Address	Contact Details
Support Team	Support Services	No. 107/3, 2nd floor, 80 feet road,4th block, Koramangala, Bangalore - 560034	080-46016700 <a href="mailto:grievance@alpha-grep.com">grievance@alpha-grep.com</a>
Head Customer Service	Raghavendra B	No. 107/3, 2nd floor, 80 feet road,4th block, Koramangala, Bangalore - 560034	080-46016700 <a href="mailto:braghavendra@alphagrep.com">braghavendra@alphagrep.com</a>
Compliance Officer	Raghavendra B	No. 107/3, 2nd floor, 80 feet road,4th block, Koramangala, Bangalore - 560034	9035099467 <a href="mailto:compliance@alphagrep.com">compliance@alphagrep.com</a>
Designated Director & CEO	Mohit Mutreja	No. 107/3, 2nd floor, 80 feet road,4th block, Koramangala, Bangalore - 560034	02268858700 <a href="mailto:compliance@alphagrep.com">compliance@alphagrep.com</a>

In case the grievance is not resolved to the investor's satisfaction or no response is received within the prescribed timelines, the investor may escalate the complaint through the following channels:

➤ **Level-2 | Depository:**

Investors may lodge complaints directly with CDSL through the online grievance redressal system available on its official website at <https://www.cdslindia.com/eservices/footer/grievances>.

➤ **Level 3 | SEBI (SCORES Platform):**

Investors may escalate complaints on SCORES after approaching the DP / Depository, if the grievance remains unresolved or the response is unsatisfactory at <https://scores.sebi.gov.in>

## Filing of Complaints on SCORES 2.0 (SEBI Complaints Redress System)

### Overview

**Securities and Exchange Board of India Complaints Redress System 2.0 (SCORES)** is a centralized, web-based platform enabling investors to lodge and track complaints against SEBI-registered intermediaries, including Depository Participants (DPs), and obtain time-bound resolution under SEBI oversight, and is aimed to bolster the efficiency and user-friendliness of investor grievance redressal in the securities market.

### Lodging of Complaints

Investors are advised to initially approach the concerned DP for grievance redressal. In case the complaint remains unresolved or the response is unsatisfactory, the same may be escalated through SCORES.

### Registration and Filing Process

Investors are required to register on SCORES 2.0 (<https://scores.sebi.gov.in>) prior to lodging a complaint. Upon registration, complaints may be filed by:

- Selecting the relevant intermediary
- Providing details of the grievance
- Uploading supporting documents

A **unique registration number** is generated for tracking purposes.

### Mandatory Details

The following details are required for registration and complaint filing:

- Name
- PAN
- Date of Birth
- Address
- Mobile Number
- Email ID

Incomplete or inaccurate information may lead to non-processing of the complaint.

### Investor Rights (Grievance Redressal)

Investors are entitled to:

- Fair and equitable treatment
- Time-bound resolution of grievances
- Access to escalation mechanisms including DP, Depository, and SEBI (via SCORES)

## INVESTOR CHARTER – DEPOSITORY PARTICIPANT

### I. Vision

To make the Indian securities market transparent, efficient and investor friendly by providing safe, reliable, transparent and trusted record keeping platform for investors to hold and transfer securities in dematerialized form.

### II. Mission

- ✓ To hold securities of investors in dematerialized form and facilitate transfer while ensuring safekeeping of securities and protecting interest of investors.
- ✓ To provide timely and accurate information to investors with regard to their holdings and transfer of securities.
- ✓ To provide highest standards of investor education, awareness and timely services.

### III. Details of Business

A Depository is an entity that holds investors' securities in electronic form. It facilitates services to various market participants, including stock exchanges, clearing corporations, depository participants (DPs), issuers, and investors, across both primary and secondary markets. The depository conducts its operations through intermediaries known as Depository Participants (DPs). The details available on the link <https://www.alpha-grep.com/company-information/>.

### IV. Services Provided by DP

#### IV (1). Basic Services:

Sr. No.	Service	Expected Timelines for processing by the DP
1	<b>Dematerialisation</b>	7 days
2	<b>Rematerialisation</b>	7 days
3	<b>Mutual Fund Conversion</b>	5 days
4	<b>Re-conversion of Mutual Funds</b>	7 days
5	<b>Transmission</b>	7 days
6	<b>Pledge</b>	15 days
7	<b>Closure of account</b>	30 days
8	<b>Settlement Instructions</b>	<ul style="list-style-type: none"> <li>○ For T+1day settlements, Participants shall accept instructions from the Clients, in physical form up to 4 p.m. (in case of electronic instructions up to 6.00 p.m.) on T-day for pay-in of securities.</li> <li>○ For T+0day settlements, Participants shall accept EPI instructions from the clients, till 11:00 AM on T Day.</li> </ul> <p><b>Note: 'T' refers 'Trade Day'</b></p>

**IV (2). Depositories provide special services like pledge, hypothecation, internet-based services etc. in addition to their core services and these include**

<b>Sl. No.</b>	<b>Type of Activity/ Service</b>	<b>Brief about the Activity / Service</b>
<b>1.</b>	<b>Value Added Services</b>	<p><b>Depositories also provide value added services such as:</b></p> <ul style="list-style-type: none"> <li>a. Basic Services Demat Account (BSDA)</li> <li>b. Transposition cum dematerialization</li> <li>c. Linkages with Clearing System</li> <li>d. Distribution of cash and non-cash corporate benefits (Bonus, Rights, IPOs etc.), stock lending, demat of NSC / KVP, demat of warehouse receipts etc.</li> </ul>
<b>2.</b>	<b>Consolidated Account statement (CAS)</b>	CAS is issued 10 days from the end of the month (if there were transactions in the previous month) or half yearly (if no transactions).
<b>3.</b>	<b>Digitalization of services provided by the depositories</b>	<p><b>Depositories offer below technology solutions and e-facilities to their demat account holders through DPs:</b></p> <ul style="list-style-type: none"> <li>a) E-account opening</li> <li>b) Online instructions for execution</li> <li>c) e-DIS / Demat Gateway</li> <li>d) e-CAS facility</li> <li>e) Miscellaneous services</li> </ul> <p><i>#Please note that AlphaGrep is currently not providing these services.</i></p>

**V. Grievance Redressal Mechanism**

<b>Sl. No.</b>	<b>Particulars</b>	<b>Details</b>
<b>1.</b>	<b>Investor Complaints / Grievances</b>	<p>Investor can lodge complaints/grievances against the Depository/DP through the following modes:</p> <p><b>a. Electronic Mode:</b></p> <p><b>(i) SCORES 2.0</b> – Centralized web-based grievance redressal system of SEBI. Two-level review mechanism:</p> <ul style="list-style-type: none"> <li>– <b>First review:</b> Designated Body</li> <li>– <b>Second review:</b> SEBI</li> </ul>

		<p><b>(ii) Respective Depository's and Depository Participant's grievance portal.</b></p> <p>(ii)(a) Email to designated grievance email ID of the Depository: <a href="mailto:complaints@cdslindia.com">complaints@cdslindia.com</a></p> <p>(ii)(b) Email to designated grievance email ID of the Depository Participant: <a href="mailto:grievance@alpha-grep.com">grievance@alpha-grep.com</a></p> <p><b>b. Offline Mode:</b></p> <p>Investors can send physical letters to CDSL on our registered office address.</p> <p>The complaints/ grievances lodged directly with the Depository shall be resolved within 21 days.</p> <p><b>Timeline:</b> Complaints lodged with the Depository shall be resolved within 21 days.</p>
2.	<b>Online Dispute Resolution (ODR)</b>	<p>If the investor is not satisfied with the resolution provided by the DP or other market participants, the investor may escalate the complaint through the Online Dispute Resolution (ODR) mechanism for resolution through conciliation or arbitration via the SMART ODR platform at <a href="https://smartodr.in/login">https://smartodr.in/login</a></p>
3.	<b>Process Flow under ODR (Review, Conciliation and Arbitration)</b>	<ul style="list-style-type: none"> <li>➤ Investor to approach Market Participant for redressal of complaint</li> <li>➤ If investor is not satisfied with response of Market Participant, he/she can escalate the complaint on SEBI SCORES portal</li> <li>➤ Alternatively, the investor may also file a complaint on SMARTODR portal for its resolution through online conciliation and arbitration</li> <li>➤ Upon receipt of complaint on SMARTODR portal, the relevant MII will review the matter and endeavour to resolve the matter between the Market Participant and investor within <b>21 days</b></li> <li>➤ If the matter could not be amicably resolved, then the Investor may request the MII to refer the matter for conciliation</li> </ul>

		<ul style="list-style-type: none"> <li>➤ During the conciliation process, the conciliator will endeavour for amicable settlement of the dispute within <b>21 days</b>, which may be extended by <b>10 days</b></li> <li>➤ If the conciliation is unsuccessful, then the investor may request to refer the matter for arbitration</li> <li>➤ The arbitration process shall be concluded by the arbitrator(s) within <b>30 days</b>, which is extendable by <b>30 days</b></li> </ul>
4	<p><b>Claim to be filed by Beneficial Owner</b></p>	<p>The Beneficial owner who suffered a loss due to the actions of Depository Participant (“DP”)/ Central Depository Services (India) Limited (“CDSL”) needs to file their claim with DP/ CDSL along with relevant documents including but not limited to:</p> <p><b>Statement of claim</b></p> <ul style="list-style-type: none"> <li>▪ Details of estimated loss (including calculation) and supporting documents</li> <li>▪ FIR Copy (in case of alleged fraud and infidelity of employee)</li> <li>▪ Declaration stating that same relief has not been sought before any other fora</li> </ul> <p>The hard copy of the claim is to be addressed to:</p> <ul style="list-style-type: none"> <li>▪ The Compliance Officer, at the address - No. 107/3, 2nd floor, 80 feet road, 4th block Koramangala, Bangalore - 560034, and the soft copy is to be submitted to the Email ID: <a href="mailto:grievance@alpha-grep.com">grievance@alpha-grep.com</a></li> <li>▪ CDSL Legal Team at the registered office of the Company and the soft copy is to be submitted to the Email ID - <a href="mailto:claims@cdslindia.com">claims@cdslindia.com</a></li> </ul>
5	<p><b>Person with Disabilities (PwDs)</b></p>	<p>Persons with Disabilities (PwDs), may lodge complaints/grievances against the Depository or Depository Participant (DP) through the following mechanisms:</p> <ul style="list-style-type: none"> <li>• Respective Depository’s web portal dedicated for the filing of complaints at <a href="https://www.cdslindia.com/eservices/footer/grievances">https://www.cdslindia.com/eservices/footer/grievances</a></li> <li>• Emails to designated email IDs of Depository <a href="mailto:pwds@cdslindia.com">pwds@cdslindia.com</a></li> <li>• Investors can send physical letters to CDSL on our registered office address or can connect with us through our helpline number: 022 6234 3748</li> </ul>

## VI. Guidance pertaining to Special Circumstances related to Market Activities: Termination of the Depository Participant

Sr. No.	Type of Special Circumstances	Timelines for the Activity / Service
1	Depository may terminate the participation of a Participant in case it no longer meets eligibility criteria and/or on any grounds as specified in the Bye-laws, including suspension of trading member by the Stock Exchanges.	The client shall have the right to transfer all securities to any other Participant of his/her choice without any charges for such transfer within <b>30 days</b> from the date of intimation by way of letter/email.
2	Participant surrenders participation voluntarily.	

## VII. Dos and Don'ts for Investors

Sr. No.	Guidance
i	Always deal with a SEBI registered Depository Participant for opening a demat account.
ii	Read all the documents carefully before signing them.
iii	Before granting Power of attorney to operate your demat account to an intermediary like Stock Broker, Portfolio Management Services (PMS) etc., carefully examine the scope and implications of powers being granted.
iv	Always make payments to registered intermediary using banking channels. No payment should be made in name of employee of intermediary.
v	Accept the Delivery Instruction Slip (DIS) book from your DP only (pre-printed with a serial number along with your Client ID) and keep it in safe custody and do not sign or issue blank or partially filled DIS slips. Always mention the details like ISIN, number of securities accurately. In case of any queries, please contact your DP or broker and it should be signed by all demat account holders. Strike out any blank space on the slip and Cancellations or corrections on the DIS should be initialed or signed by all the account holder(s). Do not leave your instruction slip book with anyone else. Do not sign blank DIS as it is equivalent to a bearer cheque.
vi	Inform any change in your Personal Information (for example address or Bank Account details, email ID, Mobile number) linked to your demat account in the prescribed format and obtain confirmation of updation in system
vii	Mention your Mobile Number and email ID in account opening form to receive SMS alerts and regular updates directly from depository.
viii	Always ensure that the mobile number and email ID linked to your demat account are the same as provided at the time of account opening/updation.
ix	Do not share password of your online trading and demat account with anyone.
x	Do not share One Time Password (OTP) received from banks, brokers, etc. These are meant to be used by you only.

Sr. No.	Guidance
xi	Do not share login credentials of e-facilities provided by the depositories such as e-DIS/demat gateway, SPEED-e/easiest etc. with anyone else.
xii	Demat is mandatory for any transfer of securities of Listed public limited companies.
xiii	If you have any grievance in respect of your demat account, please write to designated email IDs of depositories or you may lodge the same with SEBI online at <a href="https://scores.sebi.gov.in">https://scores.sebi.gov.in</a>
xiv	Keep a record of documents signed, DIS issued and account statements received.
xv	As Investors you are required to verify the transaction statement carefully for all debits and credits in your account. In case of any unauthorized debit or credit, inform the DP or your respective Depository.
xvi	Appoint a nominee to facilitate your heirs in obtaining the securities in your demat account, on completion of the necessary procedures.
xvii	Register for Depository's internet based facility or download mobile app of the depository to monitor your holdings.
xviii	Ensure that, both, your holding and transaction statements are received periodically as instructed to your DP. You are entitled to receive a transaction statement every month if you have any transactions.
xix	Do not follow herd mentality for investments. Seek expert and professional advice for your investments
xx	Beware of assured/fixed returns.

### VIII. Rights of Investors

- i. To receive copies of Know Your Client (KYC) documents and account opening documents executed with the Depository Participant.
- ii. No minimum balance is required to be maintained in a demat account, unless specifically mandated under applicable regulations.
- iii. To be informed about charges applicable to the demat account, including that no charges are payable for opening of a demat account, if so prescribed under applicable regulations.
- iv. Where a Power of Attorney (PoA) is executed, to receive a copy of the same. Execution of PoA is not mandatory, and the investor retains the right to revoke any such authorization at any time, in accordance with applicable procedures.
- v. To open one or more demat accounts in the same name with a single Depository Participant or with multiple Depository Participants, subject to applicable regulations.
- vi. To receive periodic statements of account. In case of any discrepancy, the investor has the right to approach the Depository Participant for resolution, and if unresolved, to escalate the matter to the depository.
- vii. To create pledge and/or any other permitted encumbrance on securities held in the demat account, in accordance with applicable regulations.

- viii. To provide standing instructions for credit of securities into the demat account, as per applicable procedures.
- ix. To exercise the right to freeze or unfreeze the demat account or specific securities or quantities therein, subject to applicable guidelines.
- x. To seek redressal of grievances by approaching the Depository Participant, the depository, or the Securities and Exchange Board of India (SEBI), within the framework of prescribed timelines.
- xi. To participate in corporate actions, including exercising voting rights on resolutions of companies, in accordance with applicable mechanisms provided by the depository.
- xii. To receive prior intimation of any changes in charges or fees. Any revision in charges shall be effected only after giving due notice, as prescribed under applicable regulations.
- xiii. To claim indemnification for any loss arising due to negligence or deficiency in service by the Depository Participant or the depository, in accordance with applicable laws and regulations.
- xiv. To opt out of the depository system in respect of any security, subject to applicable procedures and regulatory requirements.

#### **IX. Responsibilities of Investors**

- i. Deal with a SEBI registered DP for opening demat account, KYC and Depository activities.
- ii. Provide complete documents for account opening and KYC (Know Your Client). Fill all the required details in Account Opening Form / KYC form in own handwriting and cancel out the blanks.
- iii. Read all documents and conditions being agreed before signing the account opening form.
- iv. Accept the Delivery Instruction Slip (DIS) book from DP only (preprinted with a serial number along with client ID) and keep it in safe custody and do not sign or issue blank or partially filled DIS.
- v. Always mention the details like ISIN, number of securities accurately.
- vi. Inform any change in information linked to demat account and obtain confirmation of updation in the system.
- vii. Regularly verify balances and demat statement and reconcile with trades / transactions.
- viii. Appoint nominee(s) to facilitate heirs in obtaining the securities in their demat account.
- ix. Do not fall prey to fraudsters sending emails and SMSs luring to trade in stocks / securities promising huge profits

## **X. Code of Conduct for Depositories**

### **A Depository shall:**

- a. Comply with the provisions of the Securities and Exchange Board of India Act, 1992, the Depositories Act, 1996, and all applicable rules, regulations, circulars, guidelines, and directions issued by SEBI from time to time.
- b. Exercise due diligence in the conduct of its business and operations.
- c. Implement appropriate risk management systems and sound governance practices.
- d. Undertake measures for investor protection and investor education.
- e. Ensure fair and transparent treatment of all participants and stakeholders.
- f. Promptly report to SEBI any violations or non-compliance by issuers or their agents with applicable laws and regulations.
- g. Act in a proactive and responsible manner to safeguard investor interests and maintain the integrity of the securities market.
- h. Promote and adopt best industry practices in its operations and among its participants.
- i. Act in good faith and avoid conflicts of interest in the discharge of its functions.
- j. Refrain from engaging in unfair competition that may adversely affect other depositories, participants, or investors.
- k. Clearly define and segregate roles and responsibilities of key management personnel, including allocation of legal, regulatory, risk management, and compliance functions.
- l. Be accountable for the acts and omissions of its employees in the course of its business operations.
- m. Monitor compliance by participants with applicable regulatory requirements and ensure that their conduct safeguards investor interests and the securities market.

## **XI. Code of Conduct for Participants (DPs)**

1. A participant shall make all efforts to protect the interests of investors.
2. A participant shall always endeavour to-
  - (a) render the best possible advice to the clients having regard to the client's needs and the environment and his own professional skills;
  - (b) ensure that all professional dealings are effected in a prompt, effective and efficient manner;
  - (c) enquiries from investors are adequately dealt with;
  - (d) grievances of investors are redressed without any delay.

3. A participant shall maintain high standards of integrity in all its dealings with its clients and other intermediaries, in the conduct of its business.
4. A participant shall be prompt and diligent in opening of a beneficial owner account, dispatch of the dematerialisation request form, rematerialization request form and execution of debit instruction slip and in all the other activities undertaken by him on behalf of the beneficial owners.
5. A participant shall endeavour to resolve all the complaints against it or in respect of the activities carried out by it as quickly as possible, and not later than one month of receipt.
6. A participant shall not increase charges/fees for the services rendered without proper advance notice to the beneficial owners.
7. A participant shall not indulge in any unfair competition, which is likely to harm the interests of other participants or investors or is likely to place such other participants in a disadvantageous position while competing for or executing any assignment.
8. A participant shall not make any exaggerated statement whether oral or written to the clients either about its qualifications or capability to render certain services or about its achievements in regard to services rendered to other clients.
9. A participant shall not divulge to other clients, press or any other person any information about its clients which has come to its knowledge except with the approval/authorisation of the clients or when it is required to disclose the information under the requirements of any Act, Rules or Regulations.
10. A participant shall co-operate with the Board as and when required.
11. A participant shall maintain the required level of knowledge and competency and abide by the provisions of the Act, Rules, Regulations and circulars and directions issued by the Board. The participant shall also comply with the award of the Ombudsman passed under the Securities and Exchange Board of India (Ombudsman) Regulations, 2003.
12. A participant shall not make any untrue statement or suppress any material fact in any documents, reports, papers or information furnished to the Board.
13. A participant shall not neglect or fail or refuse to submit to the Board or other agencies with which it is registered, such books, documents, correspondence, and papers or any part thereof as may be demanded/requested from time to time.
14. A participant shall ensure that the Board is promptly informed about any action, legal proceedings, etc., initiated against it in respect of material breach or non-compliance by it, of any law, Rules, regulations, directions of the Board or of any other regulatory body.
15. A participant shall maintain a proper inward system for all types of mail received in all forms.
16. A participant shall follow the maker-checker concept in all of its activities to ensure the accuracy of the data and as a mechanism to check unauthorised transactions.

17. A participant shall take adequate and necessary steps to ensure that continuity in data and record keeping is maintained and that the data or records are not lost or destroyed. It shall also ensure that for electronic records and data, up-to-date back-up is always available with it.
18. A participant shall provide adequate freedom and powers to its compliance officer for the effective discharge of his duties.
19. A participant shall ensure that it has satisfactory internal control procedures in place as well as adequate financial and operational capabilities which can be reasonably expected to take care of any losses arising due to theft, fraud and other dishonest acts, professional misconduct or omissions.
20. A participant shall be responsible for the acts or omissions of its employees and agents in respect of the conduct of its business.
21. A participant shall ensure that the senior management, particularly decision makers, have access to all relevant information about the business on a timely basis.
22. A participant shall ensure that good corporate policies and corporate governance are in place.