

# **Old Bridge Asset Management Private Limited**

## **Grievance and Complaint Redressal Policy**

**Version No. 1.1**

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## 1. Introduction

We at Old Bridge Asset Management Private Limited (OBAMPL) believe that Investor Service is an important element for the growth of business and we want to ensure that our Investors experience customer delight across different touch points of OBAMPL. Efficient and prompt service is essential for retaining existing relationships and therefore Investor satisfaction becomes very prudent. Investor queries and complaints constitute an important voice of Investor, and this policy details grievance handling through a structured grievance redressal framework. Grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in future.

Communications received from the Investors will be identified as query/grievance and complaint on the basis of nature and set parameters which are explained in **Annexure 1**. Any lapses which result in interactions and can be substantiated / proved to have occurred on account of OBAMPL and / or OBAMPL service providers will, in the normal course be considered as a complaint. In case the lapse is due to misinformation or mistake on the part of the investor or any external agency then such a lapse will not be treated as a complaint.

The set parameters are indicative as of the date of the policy and the OBAMPL can edit / delete / modify / add parameters over a period of time at regular intervals to include / exclude interactions received from the Investors for considering the same as complaint. Parameters that are wide having more than one interpretation would be interpreted as per set industry practices / proven nomenclature / precedents for the benefit of the Investors. There are certain guidelines laid down by SEBI within which the OBAMPL is obliged to reply to its investors, in case the nature of the queries / complaint is such that it falls outside the purview of the SEBI guidelines, and then the OBAMPL will follow the standards set by the industry. Else the OBAMPL will follow a precedent in case such a query / complaint has been received in the past. In case the OBAMPL proactively fixes its own service standard, which is better than the one lay down by SEBI, then the better service standard will hold true and the breach of the better service standard will be considered as a complaint. In case the OBAMPL proactively finds an error in any records of the Investor or otherwise and OBAMPL initiates rectification of that error in conjunction with the Investor, then such an error if identified by the investor may not be considered as a complaint.

## 2. Grievances Modes of Receipt

- Walk-in
- Phone (IVRS/Direct)
- Email/Online (Website)
- Fax
- Letter
- Other Statutory Institutions (SEBI/AMFI etc.)
- Legal Complaints (Court/Consumer forum etc.)

### 3. Grievance acceptance and scrutiny

As and when AMC/K-Fin Technologies Limited (RTA) branch receives a request, it is scrutinized whether the folio number is mentioned correctly and the signature of investor is appended etc. The request is then affixed with inward stamp with date and time at the branch where accepted and issue the acknowledgment to client.

All Grievances thus received are serially updated by local RTA branch and mailed to RTA HO. On receipt of the original request by RTA HO, the signatures are tallied and necessary changes are effected/updated/corrected and account statements/conformations/ information's are couriered/mailed to investors. If signature differs, the RTA reject the request and rejection letters are mailed to investors.

### 4. Modes/Means for Investor to register Queries/Complaint (Grievance Redressal Mechanism)

#### Procedure 1

Investor queries / complaints arise due to a deficiency of service experienced by Investors or lack of understanding or deficiency of service may include lack of clarifications, explanations, understanding which escalates into shortfalls in the expected delivery standards, either due to inadequacy of facilities available or through the attitude of staff towards Investors.

Investors can seek clarification to their query and are further entitled to make a complaint in writing, orally or telephonically. Investors are requested to approach the OBAMPL directly and not any OBAMPL's service provider to register a query / complaint through any of the touch points mentioned below, and in the normal course can expect a response within 2 business days of query / complaint registration. In case Investors approach the RTA directly or the OBAMPL's service provider to register a query / complaint, investors shall receive response to their query / complaint from the OBAMPL and not from the OBAMPL's service provider.

**Contact Centre:** Investors can call the OBAMPL contact centre on 18003094034 (toll free) between 9.00 am & 5.00 pm from Monday to Friday or +91 22 022-69459999 (non-toll free) between 9.00 am to 7.00 pm from Monday to Saturday to provide feedback & register their queries / complaints.

**Email:** Investors can send an email to [services@oldbridgemf.com](mailto:services@oldbridgemf.com)

**Letter:** Investors can write to the OBAMPL with their query/complaint at the registered office address as mentioned below.

**Old Bridge Asset Management Private Limited**  
1705, ONE BKC, C Wing, G - Block,

Bandra Kurla Complex,  
Bandra East, Mumbai – 400 051.

**Website:** Investors can also write to the OBAMPL by accessing the customer feedback form available on the Old Bridge MF website under Feedback/Inquiry option. All queries / complaints received at the OBAMPL or RTA will be handled & coordinated by the Investor Service Team. The Investor Service Team will also inform Investors on the status of their query.

## **Procedure 2**

Investors can also independently address Complaints / grievances to Mr. Manish Bhojraj , Investor Relations Officer (IRO) in case they are not satisfied with the responses received as per procedure 1 above at:

**Old Bridge Asset Management Private Limited,**  
1705, ONE BKC, C Wing, G – Block,  
Bandra Kurla Complex,  
Bandra East, Mumbai – 400 051

Contact Details:

(RTA's) Toll Free Tel No. 18003094034

Fax No. +91 22 6945 9941

Email : [services@oldbridgemf.com](mailto:services@oldbridgemf.com)

Mr. Manish Bhojraj is aware of the complaint and grievance handling process and the grievance redressal mechanism of the OBAMPL and shall, independent of the Investor Service Team; ensure that the Complaints / Grievances received from Investors are resolved without prejudice in good faith and in the best interests of our Investors thus ensuring retention of Investor's confidence. The investor can expect a reply within 7 business days of approaching the IRO.

## **Procedure 3**

Investors can write to the CEO at [ceo@oldbridgemf.com](mailto:ceo@oldbridgemf.com) if they do not receive a response within 10 business days of writing to the Investor Service Team or to the IRO, or if he/she is not satisfied with the response received. The investor can expect a reply within 10 business days of approaching the CEO

## **Procedure 4**

In case Investors do not receive a response within 21 Calendar days of approaching OBAMPL, or if they are not satisfied with the resolution received from the Firm, they can escalate their issues to SEBI (Securities and Exchange Board of India) and update their complaints on SCORES (SEBI Complaints Redress System). SCORES allows the investor to lodge his complaint online with SEBI and subsequently view its status at

<http://scores.gov.in/> . Display SCORES link/option to lodge complaint in the website and mobile apps.

Investors can now also lodge their complaints pertaining to KRA [KYC Registration Agency] through the SCORES system.

SEBI has launched a toll-free helpline service number (1800 22 7575 / 1800 266 7575) for investors all over India in 14 languages available on all business days during Monday to Friday from 9:30 A.M to 5.30 p.m. The above toll-free helpline service on Saturday and Sunday would be available presently to investors all over India in English, Hindi, Marathi and Gujarati only from 9:30 a.m. to 5:30 p.m.

## **Procedure 5**

### **SMART ODR PORTAL**

After contacting OBAMPL and SEBI (SCORES), if the investors are still not satisfied with the outcome, they can opt for an online resolution of dispute through Conciliation/Arbitration on SMART ODR Portal at smartodr.in Alternatively, the investors can initiate dispute resolution through the ODR Portal if the grievance lodged with the OBAMPL is not satisfactorily resolved. OBAMPL may also initiate dispute resolution through the ODR Portal after having given due notice of at least 15 calendar days to the investors for resolution of the dispute which has not been satisfactorily resolved between them. For details on the process and terms & conditions [Click Here](#) (Link to SEBI Circular dated July 31, 2023)

## **5. Mechanism to Handle Investor Queries/Complaints**

### **5.1 Resolution of Grievances**

The Investor Service Team receiving the query/complaint is responsible for the resolution of query/complaint. The Investor Service Team at the first level is responsible for ensuring that the query / complaint is resolved to the investor's satisfaction and must attempt to offer the investor alternate solutions, however if the investor remains unsatisfied with the resolution, he can escalate the issue through the grievance redressal mechanism.

#### **Grievance's monitoring:**

- ✓ Investor Service Department (ISD) will closely monitor all grievances on daily basis.
- ✓ On a weekly basis K-Fin Technologies Limited will provide the opening balance of grievances received, solved and closing balance to ISD.

- ✓ If any grievance exceeds defined TAT, RTA will provide the reason for delay, in writing, to ISD.
- ✓ If any information is required from AMC to attend to the query, ISD will collect the information and provide the same to RTA.
- ✓ All SEBI/Court cases/ consumer forum cases will be attended by AMC HO and Head of the Investor Service/ designated person will sign on the reply.
- ✓ All Banking related Non-Commercial Transactions (NCT) like duplicate/ revalidation of divided/ redemption warrant etc. ISD will co-ordinate with AMC banking team and provide the information to K-Fin Technologies Limited.
- ✓ ISD will provide the NCT report to Compliance officer for updating the same in Offer Document/ Fact sheet etc from time to time.
- ✓ ISD is responsible for any delay in NCT related queries.

## 5.2 Turnaround Time (TAT)

Queries/Complaints are investigated within the stipulated timelines for handling queries / complaints received at the different levels of escalation and addressed within the defined TAT. Certain types of queries / complaints, involving fraud, legal inputs and third party (Other banks/Aggregator), needing more time for investigation, are acknowledged accordingly and the turnaround time is communicated to the investor. The communication of the OBAMPL's stand on any issue is important and is done clearly in an investor friendly manner.

Service Request and Grievance's category wise Turn Around Time (TAT): as and when amended

Sr. No.	Activity	TAT
1.	Change of Address	R+2
2.	Change of Bank Mandate	R+2
3.	Change in Mode of Holding	R+2
4.	Change of Status	R+2
5.	Change of Option	R+2
6.	Change in Name / Divorce/ Marriage / Adoption	R+5
7.	Transmission	R+5
8.	Addition/change in holding pattern	R+2
9.	Registration/ Cancellation of Nominee	R+2
10.	Transfer of the Units	@
11.	Discrepancy in personal data	R+2
12.	Discrepancy in Trade data	R+2
13.	Consolidation of folio's	R+2
14.	Pledge/ Un-pledge the Units	R+5
15.	Registration/Revocation of POA	R+3
16.	Minor attained Major	R+3
17.	Duplicate / Annual A/c statement	R day
18.	Request for re-dispatch of RUD	R+2

19.	Lien or lift the lien on folio	R+3
20.	Request for OD/KIM/Factsheet	R+1
21.	Broker code change in existing holding	R+2
22.	Non receipt of warrant	R+2 #
23.	Issue of duplicate warrant	R+5 #
24.	Revalidation of warrant	R+5 #
25.	Brokerage related query (brokerage, TDS, Service tax certificate, etc)	R+4
26.	Request for TDS Certificate (₹)	R+1
27.	PIN Agreement for transact online	R+1
28.	SIP Registration/ discontinue	R+2
29.	Legal/Court/Consumer forum cases/notices	R+7

*R = Request received at AMC/RTA (name of RTA)*

*# Depend upon receipt of warrant/DD from Bank*

*@ Depend upon Third party (Depository Participant) resolution.*

## 6. Awareness/Training on Handling Complaints

The Investor Service Team is specially trained for handling queries / complaints. Training includes both operations and soft skills, as different Investors perceive and react differently to the aspects of complaint handling. The staff is encouraged to have an open attitude towards service recovery and winning the Investor's confidence.

## 7. Quarterly Report

Compliance Department is informed about the number of complaints received, pending together with aging analysis, nature of complaints that have risen sharply as against their previous month number, area or locations that resulted into rise of complaints etc. Also, any improvement done or area of lacunae identified should be included in the report. Compliance Department or Internal Auditors may conduct internal audit for assessing the adherence to the Policy.

## 8. Disclosure of Queries / Complaints

Disclose the details of investor complaints on their respective websites as well as on AMFI website on a monthly basis, as per the format enclosed at Annexure - A to the circular no. SEBI/HO/IMD-II-DOF10/P/CIR/2021/00677 dated December 10, 2021. The information shall be made available within 7<sup>th</sup> of succeeding month.

## 9. Facilitate Investors Awareness

AMC shall display the *Investor Charter for Mutual Fund* at prominent places in the office and disclosing the Investors Charter on websites as per the Annexure - B to the circular no. SEBI/HO/IMD-II-DOF10/P/CIR/2021/00677 dated December 10, 2021.



<b>Annexure 1 List of Complaints</b>		
<b>Complaint Code</b>	<b>Type of complaint</b>	<b>Description</b>
<b>I A</b>	Non receipt of amount declared under Income Distribution cum Capital Withdrawal option	
<b>I B</b>	Interest on delayed payment of amount declared under Income Distribution cum Capital Withdrawal option	
<b>I C</b>	Non receipt of Redemption Proceeds	
<b>I D</b>	Interest on delayed payment of Redemption	
<b>II A</b>	Non receipt of Statement of Account/Unit Certificate	
<b>II B</b>	Discrepancy in Statement of Account	
<b>II C</b>	Data corrections in Investor details	
<b>II D</b>	Non receipt of Annual Report/ Abridged Summary	
<b>III A</b>	Wrong switch between Schemes	
<b>III B</b>	Unauthorized switch between Schemes	
<b>III C</b>	Deviation from Scheme attributes	
<b>III D</b>	Wrong or excess charges/load	
<b>III E</b>	Non Updation of changes viz. address, PAN, bank details, nomination, etc	
<b>III F</b>	Delay in allotment of Units	
<b>III G</b>	Unauthorized Redemption	
<b>IV</b>	Others	