Synergy Dealcom (IFSC) Pvt Ltd.

MEMBER: INDIAINX, NSE IFSC

Policy for Complaint Handling and Grievance Redressal

1. Background:

This Complaint Handling and Grievance Redressal Policy is framed in accordance with Circular No. F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 02, 2024 and January 13, 2025 issued by the International Financial Services Centres Authority ("IFSCA).

As per the Circular, every regulated Entity (RE) operating in the IFSC is required to establish a policy on handling complaints and Grievance redressal, duly approved by its Board of Directors (or equivalent governing body).

2. Objective

This Investor Grievance Policy establishes a structured framework for handling complaints and grievances from investors. It ensures fairness, transparency, and timely resolution in compliance with the guidelines issued by the International Financial Services Centres Authority (IFSCA).

3. Scope

This policy applies to all complaints and grievances raised by investors or consumers of the Synergy Dealcom (IFSC) Private Limited operating in GIFT-CITY.

The complaint handling process shall:

- Ensure acknowledgement of complaints within defined timelines.
- Provide fair, equitable and unbiased resolution.
- Keep complaints informed of progress throughout the process.
- Dispose of complaints within the prescribed time limits.

4. Definitions:

I. **Complaints:** An expression of dissatisfaction made to the Synergy Dealcom (IFSC) Private Limited of any nature related to its services ot the way they have been delivered except

- Anonymous complaints (except whistleblower complaints).
- Incomplete or un-specific complaints.
- Allegations without supporting documents.
- Suggestions or seeking guidance/explanation.
- Complaints on matters not relating to the financial products or services provided by the Regulated Entity.
- Complaints about any unregistered/ un-regulated activity.
- References in the nature of seeking information or clarifications about financial products or services.

II. "**Complainant"** shall have the same meaning as assigned to "Client" or "Customer"under clause 1.3.11 of the IFSCA (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines, 2022.

III. **"Complaint Redressal Officer" or "CRO"** shall be an employee of the Regulated Entity responsible for handling of complaints received from its consumers.

IV. **"Complaint Redressal Appellate Officer" or "CRAO"** shall be a senior level person of the Regulated Entity designated for handling appeals of consumers against the decision taken by the Complaint Redressal Officer of the Regulated Entity.

5. Complaint Handling Procedure

1. Lodging of Complaints:

Complaints can be submitted through the following channels

(i) Email: synergyifsc@gmail.com

(ii) Physical Submission: Complaint Redressal Officer

Unit no. 210, Signature Building, 2nd Floor Block 13B, Zone-1,
Gandhinagar, GIFT SEZ, Gujarat, India, 382355

- Upon receipt, the CRO will assess the merits of the complaint.
- In case of acceptance, complaints shall be acknowledged in writing within 3 working days.
- In case of non-acceptance, LGT (IFSC Branch) shall inform the complainant within 5 working days along with reasons.

2. Resolution Timeline:

- The complaint will be resolved or rejected within 15 to 30 days of acceptance.
- Rejection of complaints shall include written reasons.

3. Fair and Impartial Handling:

- If the CRO is involved in the subject matter of the complaint, an alternate officer will manage it.

4. Request for Additional Information:

The RE may seek further details from the complainant to facilitate resolution.

6. Appeal Mechanism

- Dissatisfied complainants may appeal to the CRAO within 21 days of receiving the CRO's decision.
- The CRAO shall resolve appeals within 30 days of receipt.

7. Escalation to IFSCA

If unresolved, the complainant may escalate to IFSCA at grievanceredressal@ifsca.gov.in preferably within 21 days of the CRAO's decision.

8. Record Maintenance

a) The Regulated Entity shall maintain all records relating to handling of complaints, including the following:

- Complaints received and processed;
- All correspondence exchanged between the Regulated Entity and the complainants;
- All information and documents examined and relied upon by the Regulated Entity while processing of the complaints;
- Outcome of the complaints;
- Reasons for rejection of complaints, if any;
- Timelines for processing of complaints; and
- Data of all complaints handled by it.

b) The Regulated Entity shall maintain records in electronic retrieval form for the same period as mandated by the Authority under the relevant and applicable regulations and circulars, handbooks, guidelines thereunder:

Provided that in case there is no specific mention of such time period, the record shall be maintained for at least six years from the date of disposal of complaint:

Provided further that in case of any pending litigation or legal proceeding relating to the complaint, the record shall be maintained for the applicable period, after final disposal of the proceeding.

9. Reporting

a) The Regulated Entity shall file reports on handling of complaints in the form and manner specified by the Authority from time to time.

b) The Regulated Entity shall have a section with heading "Complaint Handling and Grievance Redressal" in its Annual Report, if the entity is required to file an annual report for its business activities in the IFSC under the applicable laws. The section shall also provide data of all complaints received, resolved, rejected and pending during the year in a tabular/ graphical format:

Provided that where a Regulated Entity is not required to file an annual report for its business activities in the IFSC, it shall display the information on complaint handling on its website or on a dedicated webpage of its Group Entity, as applicable, under the heading "Complaint Handling and Grievance Redressal", on an annual basis.

10. Amendments to the Policy:

This policy has been reviewed and approved by the Board of Directors in accordance with the requirements prescribed under the IFSCA Circulars dated December 02, 2025 & January 13,02025.

The Board reaffirms its commitment to ensuring that clients complaints are handled fairly, transparently, and efficiently in alignment with regulatory expectations.