PAWAN PARMESHWAR CAPITAL PVT LTD

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Member: NSE Code: 00188 | BSE Code: 0550

COMPLAINT REDRESSAL POLICY

(Investor Grievance Redressal Framework for Clients)

Document Control

Policy Name	Complaint Redressal Policy
Version	2.0
Effective Date	20-10-2025
Approved By	Board of Directors, Pawan Parmeshwar Capital Pvt Ltd
Owner	Compliance Officer / Designated Investor Grievance Officer
Review Frequency	Annual or upon material regulatory change
Supersedes	Complaint Redressal Policy in the name of Pawankumar Parmeshwarlal (proprietorship)

1. Preamble and Objective

Pawan Parmeshwar Capital Pvt Ltd (the "Company" or the "Trading Member") is a Trading Member of the National Stock Exchange of India Limited (NSE) and BSE Limited (BSE), engaged exclusively in institutional broking. As a SEBI-registered intermediary, the Company is required to maintain a robust mechanism for receiving, investigating and resolving client complaints and to provide its clients with the avenues of escalation prescribed by SEBI and the Stock Exchanges.

The objectives of this Policy are to:

- Provide institutional clients with a transparent, time-bound and accountable framework for raising and resolving complaints;
- Specify the internal procedures, roles, responsibilities and timelines for handling complaints received directly or through the Exchanges/SEBI/SMART ODR Portal;
- Comply with the SEBI Master Circular for Stock Brokers, the SEBI SCORES framework, the SEBI Master Circular for Online Dispute Resolution and applicable Exchange directives;

- Coordinate complaint handling with the Company's obligations under the Prevention of Money Laundering Act, 2002 (PMLA) and FATCA/CRS reporting under the Income Tax Rules, 1962; and
- Define the rights of institutional/corporate clients under the SEBI ODR Master Circular to choose between the SMART ODR mechanism and an independent institutional mediation/conciliation/arbitration.

2. Scope and Applicability

This Policy applies to:

- All complaints received by the Company from its institutional clients (and, in exceptional cases, any client) relating to the Company's activities in the securities market;
- All complaints received by the Company through the SEBI SCORES Portal, the SMART ODR Portal, NSE/BSE Investor Service Cells, or any other regulatory or judicial channel;
- All directors, the Compliance Officer, the Principal Officer (under PMLA), dealers, employees and authorised persons of the Company; and
- All segments of NSE and BSE in which the Company is a Trading Member.

3. Regulatory References

This Policy has been framed in accordance with the following circulars and regulations, as amended from time to time.

3.1 SEBI Circulars and Regulations

- SEBI Master Circular for Stock Brokers No. SEBI/HO/MIRSD/MIRSD-PoD/P/CIR/2025/90 dated June 17, 2025 — Chapter on Investor Grievance Redressal.
- SEBI Master Circular on Online Resolution of Disputes in the Indian Securities Market No. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/131 dated July 31, 2023, as updated on August 11, 2023, December 20, 2023 and December 28, 2023.
- SEBI Circular SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023 — Redressal of investor grievances through the SEBI Complaint Redressal (SCORES) Platform and linking it to the Online Dispute Resolution Platform.
- SEBI (Alternative Dispute Resolution Mechanism) (Amendment) Regulations, 2023 — Gazette Notification dated July 3, 2023.
- SEBI Circular SEBI/HO/MIRSD/MIRSD_CRADT/CIR/P/2021/685 dated December 17, 2021 — Investor Charter for Stock Brokers.

3.2 PMLA / AML / FIU References

- Prevention of Money Laundering Act, 2002, including Section 12 (record-keeping) and Section 12A (prohibition on tipping-off).
- Prevention of Money Laundering (Maintenance of Records) Rules, 2005, including Rules 3 and 7.
- SEBI Master Circular on Guidelines on Anti-Money Laundering Standards and Combating the Financing of Terrorism for Securities Market Intermediaries (the latest version applicable from time to time).

3.3 FATCA / CRS References

- CBDT Notification No. 62/2015 dated August 7, 2015.
- Income Tax Rules, 1962 — Rules 114F, 114G and 114H read with Sections 285BA of the Income-tax Act, 1961.
- CBDT FATCA-CRS Guidance Notes and operational guidance issued from time to time.

3.4 Exchange Circulars

- NSE and BSE circulars on Investor Grievance Redressal, the Investor Services Cell, the Investor Grievance Redressal Committee (IGRC) and complaint reporting, as issued from time to time.

4. Definitions

Complaint: A written or recorded expression of dissatisfaction by a client (or a person acting on behalf of a client) relating to the Company's activities in the securities market, requiring a specific action or response.

Institutional Client: A client falling within the institutional category recognised by the Exchanges, including Foreign Portfolio Investors (FPIs), Mutual Funds, Banks, Insurance Companies, Domestic Financial Institutions and Pension Funds.

SCORES: SEBI Complaint Redressal System (SCORES 2.0) accessible at scores.sebi.gov.in, the centralised online platform for investor complaints against SEBI-registered entities.

SMART ODR Portal: Securities Market Approach for Resolution through ODR Portal, accessible at smartodr.in, established by the Market Infrastructure Institutions (MIIs) for online conciliation and arbitration of disputes between investors/clients and Market Participants.

Designated Body: The body designated by SEBI under the SCORES framework to monitor complaint redressal by entities. For stock brokers, the Designated Body is the Stock Exchange of which the broker is a member.

ATR: Action Taken Report uploaded by the Company on SCORES in response to a complaint.

Principal Officer (PMLA): The officer designated by the Company under the PML (Maintenance of Records) Rules, 2005 to ensure compliance with the obligations under PMLA, including filing of CTRs/STRs with FIU-IND.

Designated Investor Grievance Officer: The officer designated by the Company under SEBI requirements to receive, register and supervise resolution of investor complaints. Refer Annexure B for current designation and contact details.

5. Designated Investor Grievance Officer

The Compliance Officer of the Company shall also act as the Designated Investor Grievance Officer responsible for receiving, registering, investigating and resolving complaints, supervising the team handling complaints, and acting as the single point of contact with SEBI, the Stock Exchanges and the SMART ODR Portal. The current designation, name, email and contact details are set out in Annexure B and are also displayed on the Company's website(Currently under maintenance).

Where any complaint relates to or could reveal information regarding KYC, AML/CFT or FATCA/CRS reporting, the Designated Investor Grievance Officer shall coordinate with the Principal Officer (under PMLA) and the officer responsible for FATCA/CRS reporting, before responding to the complainant.

6. Channels for Lodging Complaints

Institutional clients may lodge complaints with the Company through any of the following channels:

1. Designated grievance email ID displayed on the Company's website (refer Annexure B);
2. Written communication addressed to the Designated Investor Grievance Officer at the Registered Office of the Company;
3. Telephone calls to the Company's office, with the requirement that any complaint received on call shall be subsequently confirmed in writing by email by the client or by the Company on the client's behalf within one working day for record;
4. Communication through the client's designated relationship manager at the Company, who shall route the complaint to the Designated Investor Grievance Officer within the same working day.

In addition, the client may at its option lodge a complaint or initiate a dispute directly through:

- The SEBI SCORES Portal at scores.sebi.gov.in; or
- The SMART ODR Portal at smartodr.in; or
- The Investor Service Cell of NSE or BSE.

7. Acknowledgement, Investigation and Resolution Timelines

The following timelines shall apply, consistent with SEBI's prescribed framework. The 21-calendar-day outer limit for complaint resolution is a regulatory requirement under SEBI's SCORES framework; the internal sub-timelines below are committed operational standards of the Company.

Action	Timeline
Acknowledgement of receipt of complaint by the Company	Within 1 working day
Internal fact-finding (call recordings, trade logs, ledgers, email trail)	Within 3 working days of receipt
Substantive response / ATR to the client	Within 21 calendar days of receipt (SEBI mandate)
Upload of Action Taken Report (ATR) on SCORES (where the complaint is routed through SCORES)	Within 21 calendar days of receipt of complaint on SCORES
Closure of complaint upon satisfaction or upon submission of ATR	On receipt of client confirmation or, in absence, on closure by SCORES/Exchange/ODR Institution

The Designated Investor Grievance Officer shall monitor all complaints to ensure timely closure within the regulatory timeline, and escalate any matter likely to exceed the timeline to the Board of Directors.

8. Complaint Categories and Classification

For internal tracking and trend analysis, complaints shall be classified into the following indicative categories:

- Trade execution (price, timing, quantity, instrument)
- Settlement and clearing (delays, mismatches, custodian rejections, DVP-related issues)
- Client account operations (statement of accounts, ledger differences, securities reconciliation)
- Contract notes, confirmations and reporting
- Brokerage, fees, charges and statutory levies
- Technology / platform / connectivity issues
- KYC, FATCA/CRS classification and onboarding

- Conduct of dealers or employees
- Regulatory / compliance / disclosure-related
- Other matters not falling within the above categories

9. Escalation Hierarchy

The complaint redressal mechanism follows a structured escalation hierarchy as established under the SEBI framework. A complainant may, at each stage, escalate to the next level if the resolution is not satisfactory or no action is initiated.

9.1 Level 1 — Direct Complaint to the Company

Every complaint shall first be addressed to the Company through any of the channels in Section 6. The Company shall acknowledge and resolve the complaint within the timelines in Section 7.

9.2 Level 2 — SCORES Portal or SMART ODR Portal

If the complainant is not satisfied with the resolution provided by the Company, or no action is initiated by the Company within the prescribed timeline, the complainant may:

- Lodge the complaint on the SEBI SCORES Portal at scores.sebi.gov.in; or
- Initiate dispute resolution directly through the SMART ODR Portal at smartodr.in, in which case the SCORES stage may be skipped.

A complaint on SCORES must be lodged within one year from the date of the cause of action. SEBI may reject complaints filed beyond this limitation period.

If a dispute is filed on the SMART ODR Portal while a complaint is pending on SCORES, the SCORES complaint shall be treated as disposed of. Once a matter is filed on SMART ODR, the same complaint cannot subsequently be filed on SCORES.

9.3 Level 3 — Designated Body Review on SCORES

Under the SCORES 2.0 framework, the Designated Body (the relevant Stock Exchange in the case of complaints against the Company) shall monitor the ATR submitted by the Company. The complainant may, within 15 calendar days of the Company's ATR, request a review by the Designated Body through SCORES.

9.4 Level 4 — Second Review by SEBI

If the complainant is dissatisfied with the Designated Body's review, the complainant may seek a second review by SEBI within 15 calendar days. SEBI's disposal of the complaint shall ordinarily be final on the SCORES platform.

9.5 Level 5 — Online Conciliation under SMART ODR

Where a dispute is filed on the SMART ODR Portal, it shall first proceed to online conciliation administered by an ODR Institution empanelled by the Market Infrastructure Institutions (MIIs).

9.6 Level 6 — Online Arbitration under SMART ODR

If conciliation is unsuccessful, the dispute shall proceed to online arbitration on the SMART ODR Portal. Awards passed in arbitration shall be subject to challenge under Section 34 of the Arbitration and Conciliation Act, 1996, before the competent court of law in India.

10. Online Dispute Resolution (ODR) Mechanism

10.1 SMART ODR Portal

The SMART ODR Portal at smartodr.in has been established by the Market Infrastructure Institutions under SEBI's Master Circular for ODR dated July 31, 2023 (as updated December 28, 2023). The Company is enrolled on the SMART ODR Portal and has executed the requisite agreements with the MIIs and empanelled ODR Institutions.

10.2 Option for Institutional and Corporate Clients

Stock brokers are listed as Schedule B intermediaries under the SEBI Master Circular for ODR. Accordingly, institutional and corporate clients of the Company have the following options to resolve disputes:

(a) Online conciliation and/or online arbitration on the SMART ODR Portal in accordance with the SEBI Master Circular for ODR; or

(b) Any independent institutional mediation, conciliation and/or arbitration institution in India, with the seat and venue of such proceedings being in India and conducted online or otherwise.

The Company's client agreements provide for this option. Institutional and corporate clients may exercise this option at the time of entering into the agreement, or thereafter as permitted by the SEBI Master Circular for ODR. If no option is exercised by the client, the default dispute resolution mechanism shall be the SMART ODR Portal.

10.3 Notice by the Company

The Company may also initiate dispute resolution against a client through the SMART ODR Portal by giving the client a notice of 15 days, in accordance with the SEBI Master Circular for ODR.

10.4 Display Obligations

In compliance with paragraph 9 of the SEBI Master Circular for ODR, the Company displays a link to the SMART ODR Portal on the home page of its website (and mobile applications, if applicable). The link to the SEBI SCORES Portal and the Investor Charter is also displayed on the website.

11. Matters Outside the Scope of ODR

Dispute resolution through the SMART ODR Portal cannot be initiated in the following circumstances, as specified in the SEBI Master Circular for ODR:

5. Where a grievance on the same matter is under consideration with the Company or the SCORES Platform;
6. Where the matter is pending before any arbitral process, court, tribunal or consumer forum, or is non-arbitrable under Indian law;
7. Matters that are appealable before the Securities Appellate Tribunal (SAT) under Section 15T of the SEBI Act, 1992, Sections 22A and 23L of the Securities Contracts (Regulation) Act, 1956, and Section 23A of the Depositories Act, 1996 (other than matters escalated through SCORES in accordance with the SEBI SCORES Circular);
8. Disputes/challenges/reviews/appeals pertaining to the enforcement and regulatory role of MIIs;
9. Matters where a moratorium is in operation under the Insolvency and Bankruptcy Code, 2016, or where liquidation or winding up has been commenced;
10. Matters against the Government of India, the President of India, a State Government or a Governor of a State.

12. Confidentiality and Interface with AML / PMLA Obligations

This section addresses the interaction between the complaint redressal procedure and the Company's obligations under the Prevention of Money Laundering Act, 2002 (PMLA).

12.1 Prohibition on Tipping-Off

Where a complaint relates to, or could reveal, information regarding any Suspicious Transaction Report (STR), Cash Transaction Report (CTR) or other report filed with the Financial Intelligence Unit – India (FIU-IND), or could indicate the existence of any such report or investigation, the Designated Investor Grievance Officer shall not disclose any such fact to the complainant. This is in compliance with Section 12A of the PMLA, which prohibits tipping-off. The Designated Investor Grievance Officer shall escalate the matter to the Principal Officer (PMLA) and coordinate the substantive response with the Principal Officer.

12.2 Independent Trigger for FIU Reporting

If facts disclosed in or arising from a complaint suggest a suspicious transaction not previously reported, the Principal Officer (PMLA) shall independently consider whether an STR is required to be filed with FIU-IND under Rule 3 of the PML (Maintenance of Records) Rules, 2005. The complaint redressal process shall neither substitute for, nor delay, such reporting.

12.3 Confidentiality of Complaint Records

All complaint records that touch on AML/CFT matters shall be marked confidential, restricted in access, and shared only with the Principal Officer, the Compliance Officer, the Board of Directors, regulators and law-enforcement agencies, as required by applicable law.

13. FATCA and CRS-Related Complaints

Complaints relating to the Company's FATCA/CRS classification of a client account, or to reporting of a Reportable Account under Rules 114F to 114H of the Income Tax Rules, 1962, shall be handled as follows:

11. The Designated Investor Grievance Officer shall route such complaints to the officer responsible for FATCA/CRS compliance, in coordination with the Compliance Officer.
12. The classification of an account as a US Reportable Account or Other Reportable Account shall be reviewed against the client's self-certification, supporting documents and any indicia of foreign status on record.
13. No unilateral change in FATCA/CRS classification shall be made on the basis of a complaint alone, without proper documentary support. Any correction to a past report that has been filed with the Income Tax Department shall be made through the prescribed Reporting Portal of the Income Tax Department, in accordance with applicable guidance.
14. The Company shall not disclose the existence of any specific FATCA/CRS filing to the client beyond what is permitted by applicable law and CBDT guidance.

14. Complaint Register and Record Retention

The Company shall maintain a Complaint Register (in physical and/or electronic form) capturing, at a minimum, the following fields for every complaint received:

- Sequential complaint reference number assigned by the Company
- Date and time of receipt of the complaint
- Channel of receipt (email, written, telephone, SCORES, SMART ODR, Exchange, etc.)
- Name of the complainant and client code
- Brief nature of the complaint and complaint category
- Date of acknowledgement

- Action taken / investigation summary
- Date of substantive response / ATR
- SCORES registration number (if any)
- SMART ODR reference number and stage (conciliation/arbitration), where applicable
- Date of final closure and basis (client satisfaction / disposal by Designated Body / ODR outcome)
- Recovery / compensation, if any
- Whether AML/FATCA flags were triggered (Yes/No), with reference to the relevant escalation

14.1 Record Retention Period

Complaint records, supporting documents, ATRs, conciliation/arbitration records and related correspondence shall be retained for a minimum period of seven (7) years from the date of final closure of the complaint. This period is set to cover, with a margin of safety, the overlapping retention requirements under:

- SEBI's general record retention requirements for Stock Brokers (minimum 5 years);
- Rule 6 of the PML (Maintenance of Records) Rules, 2005 (5 years from the end of the business relationship for KYC, and 5 years from the date of transaction for transaction records);
- Rule 114H of the Income Tax Rules, 1962 (records relating to FATCA/CRS due diligence and reporting — 6 years from the end of the year in which the report relates).

15. Reporting

15.1 Reporting to the Board of Directors

The Compliance Officer shall place before the Board of Directors, at every regular Board meeting (and in any case at least once per calendar quarter), a report containing the following:

- Number of complaints pending at the beginning of the period
- Number of complaints received during the period, by category and by channel
- Number of complaints resolved during the period and the average resolution time
- Number of complaints pending at the end of the period, with ageing
- Trends and recurring issues, and corrective/preventive actions taken
- SCORES and SMART ODR matters, with their current status
- Any matters where the regulatory 21-day timeline was breached, with reasons

- Any AML/CFT or FATCA/CRS-related escalations

15.2 Reporting to Stock Exchanges and SEBI

The Company shall submit such periodic returns, statements and complaint data to NSE, BSE and SEBI as may be prescribed from time to time, including reports through the SCORES Portal, the SMART ODR Portal and the Exchange member portals (e.g., NSE ENIT and BSE BEFS).

16. Internal Audit Coverage

The efficacy of the investor grievance redressal mechanism and the discharge of obligations towards clients is a prescribed scope item in the half-yearly Internal Audit of Stock Brokers under the SEBI Master Circular for Stock Brokers. The Internal Auditor of the Company shall:

15. Review every complaint received during the audit period and verify proper recording, timely action and final closure;
16. Independently sample complaints to verify the genuineness and adequacy of the ATR and Exchange/SCORES submissions;
17. Verify the website disclosures (designated email, SCORES link, SMART ODR link, Investor Charter, Designated Officer details);
18. Report findings and observations in the half-yearly Internal Audit Report submitted to the Stock Exchanges and the Board of Directors.

17. Display and Disclosure on Website

The Company shall prominently display on its website (and on its mobile application, if and when one is provided) the following:

19. Name, designation, postal address, telephone number and dedicated email ID of the Designated Investor Grievance Officer;
20. Dedicated email ID for receiving complaints;
21. Step-by-step procedure for lodging a complaint with the Company;
22. Link to the SEBI SCORES Portal (scores.sebi.gov.in);
23. Link to the SMART ODR Portal (smartodr.in);
24. Investor Charter as prescribed by SEBI;
25. Such other information as may be prescribed by SEBI or the Stock Exchanges from time to time.

18. Training of Staff

The Company shall ensure that all employees handling client interactions, complaint receipt and complaint resolution are trained on:

- The provisions of this Policy and the underlying SEBI framework, including SCORES 2.0 and the SMART ODR mechanism;
- The 21-calendar-day regulatory timeline and the internal timelines under Section 7;
- Confidentiality requirements and the prohibition on tipping-off under Section 12A of the PMLA;
- Coordination with the Principal Officer (PMLA) and FATCA/CRS officer for sensitive complaints;
- Use of the SCORES Portal, the SMART ODR Portal and the Exchange member portals.

Training shall be conducted at the time of induction and refreshed at least once each financial year, and on every material change in the regulatory framework.

19. Roles and Responsibilities

Role	Responsibilities
Compliance Officer / Designated Investor Grievance Officer	Single point of contact for client complaints; recording, investigation, response and closure; supervision of SCORES and SMART ODR submissions; coordination with Principal Officer (PMLA) and FATCA/CRS officer; quarterly reporting to the Board.
Principal Officer (PMLA)	Review of complaints that touch on AML/CFT or trigger STR/CTR considerations; ensuring no tipping-off; independent determination on FIU-IND reporting.
Dealers and Operations Staff	Cooperating with investigations; producing trade logs, call recordings, ledgers and other supporting records within the internal fact-finding window; refraining from any independent communication with the complainant outside the Compliance Officer's supervision.
Board of Directors	Approval and annual review of this Policy; review of quarterly complaint reports; direction on systemic issues, disciplinary matters and regulatory communications.
Internal Auditor	Half-yearly independent review of complaint records, ATRs, SCORES/ODR submissions and website disclosures; reporting of observations.

20. Policy Review and Amendments

26. This Policy shall be reviewed at least once every financial year by the Compliance Officer and placed before the Board for re-approval.
27. The Policy shall be reviewed earlier on the occurrence of any of the following: (a) a material amendment to the SEBI SCORES or ODR framework; (b) a material amendment to the SEBI Master Circular for Stock Brokers; (c) any change to PMLA, FATCA/CRS or other applicable law; or (d) any inspection or audit observation requiring revision.
28. Any amendment to this Policy shall be effective only upon approval by the Board of Directors.

21. Effective Date

This Policy shall come into effect from the date of its approval by the Board of Directors and shall supersede all earlier complaint redressal policies and procedures of the Company (including the Complaint Redressal Policy issued in the name of Pawankumar Parmeshwarlal proprietorship).

Annexure A — Quick Reference: Escalation Path for Institutional Clients

Level	Forum	What happens / Timeline
1	Direct complaint to the Company	Complaint via email, letter, telephone or relationship manager. Acknowledgement within 1 working day; resolution within 21 calendar days.
2A	SEBI SCORES Portal (scores.sebi.gov.in)	If not satisfied at Level 1, lodge on SCORES within 1 year of cause of action. Company uploads ATR within 21 calendar days.
2B	SMART ODR Portal (smartodr.in)	Direct option for institutional clients; or escalation after Level 1/2A. Filing on SMART ODR closes any pending SCORES complaint on the same matter.
3	Designated Body Review on SCORES	Review by the relevant Stock Exchange (Designated Body) within 15 calendar days of the Company's ATR, if requested by the complainant.
4	Second Review by SEBI	Within 15 calendar days of the Designated Body's review, if the complainant remains dissatisfied.
5	Online Conciliation (SMART ODR)	First mandatory stage on SMART ODR after filing. Administered by ODR Institution empanelled by MIIs.
6	Online Arbitration (SMART ODR)	If conciliation is unsuccessful. Award subject to challenge under Section 34 of the Arbitration and Conciliation Act, 1996.
Alt.	Independent Institutional Arbitration in India	Option available to institutional / corporate clients under Schedule B of the SEBI ODR Master Circular, in lieu of SMART ODR, if exercised.

Annexure B — Designated Investor Grievance Officer / Contact Details

Designation	Compliance Officer / Designated Investor Grievance Officer
Name	Mr. Rajkumar Pandey
Email	To be inserted (e.g., grievance@pawanparmeshwar.com)
Telephone	022-22014936 / 4961 3718
Postal Address	Pawan Parmeshwar Capital Pvt Ltd, 187, Dadiseth Agyari Lane, 4th Floor, Singhania Wadi, Mumbai – 400 002
Working Hours	Monday to Friday, 9:30 a.m. to 6:00 p.m. (excluding Exchange holidays)

Other regulatory channels available to clients:

- SEBI SCORES Portal: https://scores.sebi.gov.in | SEBI Toll-free Helpline: 1800 266 7575 or 1800 22 7575
- SMART ODR Portal: https://smartodr.in
- NSE Investor Service Cell: contact details available at https://www.nseindia.com
- BSE Investor Service Cell: contact details available at https://www.bseindia.com

Annexure C — Board Approval

This Complaint Redressal Policy (Version 2.0) has been reviewed and approved by the Board of Directors of Pawan Parmeshwar Capital Pvt Ltd at its meeting held on 20th Oct 2025.

For PAWAN PARMESHWAR CAPITAL PVT. LTD.

P K Choudhary

Director / Authorised Signatory

PAWAN PARMESHWAR CAPITAL PVT. LTD. MUMBAI

Director / Authorised Signatory

Name: Pawankumar Choudhary

Designation: Director

Date: 20th Oct 2025

Place: Mumbai