

QUANTUM INFORMATION SERVICES PRIVATE LIMITED

Grievance Redressal policy

Purpose

To define the Grievance redressal policy for Quantum Information Services Private Limited (hereinafter referred as PersonalFN).

Scope and Applicability

The policy shall be applicable to all the employees of Quantum Information Services Private Limited. It is made with an objective of providing all our stakeholders a platform to communicate their grievance, if any and seek a reasonable resolution for their grievance. The Policy is also made to enable PersonalFN to identify opportunities to improve its service, communication with its stakeholders.

Process:

Level I: INTERNAL

1. Mrs. Swati Savla (swati@personalfn.com) is the Grievance Officer handling complaints from the clients.
2. Initially, the client may either write up their concerns customer service on the official email info@PersonalFN.com. Such emails are handled proactively by the customer service desk to ensure that the issue is resolved at the earliest and the client is satisfied.
3. In case of non-resolution at the customer service level, the client can write to the compliance team (compliance@personalfn.com) and the matter is elevated to the management level for discussion and quick resolution.
4. Any concerns from the client which is a grievance relating to the services of our Company will be forwarded to the Compliance Team/Grievance Officer within 2 working days.
5. The Compliance Team analysis the complaint with the concerned team of the Company against which the complaint is received and accordingly within 15 working days the response will be provided to the client.
6. If the investor is not satisfied with the resolution provided by the Company. In such instances the investor may approach SEBI.

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Level 2 - SEBI SCORES:

1. Grievances / disputes / complaints which are not resolved at Level 1, or if the investor is not satisfied with the resolution provided by the Company, then a complaint may be raised SEBI Complaints Redress System ("SCORES") which can be accessed at <https://www.scores.gov.in>.

This process is as per the SEBI Circular SEBI/HO/OIAE/IGRD/CIR/P/2023/156 issued on September 20, 2023 & effective from 4th December, 2023 for all SEBI registered intermediaries regarding Redressal of investor grievances through the SEBI Complaint Redressal (SCORES) Platform and linking it to Online Dispute Resolution platform.

2. PersonalFN (*hereinafter referred to as "we" or "us"*) shall review the investors' grievances redressal mechanism from time to time to further strengthen it and rectify the existing shortcomings, if any, in line with this circular.
3. We shall resolve the complaint within 21 calendar days of receipt of such Complaint through SCORES.
4. The Complaints lodged on SCORES will be automatically forwarded to PersonalFN through SCORES for resolution and submission of Action Taken Report (ATR). We shall resolve the Complaint and upload the ATR on SCORES within 21 calendar days of receipt of the Complaint. The ATR submitted by us will be automatically routed to the complainant.
5. The Complaint against us shall be simultaneously forwarded through SCORES to the relevant Designated Body as mentioned under Schedule II of the SEBI Circular. The Designated Body shall ensure that the concerned Entity submits the ATRs within the stipulated time of 21 calendar days.
6. The Designated Body shall monitor the ATRs submitted by us under their domain and inform us to improve the quality of redressal of grievances, wherever required.
7. SEBI may concurrently monitor grievance redressal process by us and Designated Bodies.
- **First review of the Complaint:**
8. In case complainant is satisfied with the resolution provided by us vide the ATR or complainant does not choose to review the Complaint, the Complaint shall be disposed of SCORES. However, if the complainant is not satisfied, the complainant may request for a review of the resolution provided by us within 15 calendar days from the date of the ATR.

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9. In case the complainant has requested for a review of the resolution provided by us or if we have not submitted the ATR within the stipulated time of 21 calendar days, the concerned Designated Body shall take cognizance of the Complaint for first review of the resolution through SCORES. The Designated Body shall take up the first review with us, wherever required. We shall submit the ATR to the Designated Body within the time stipulated by the Designated Body.
10. The Designated Body may seek clarification on the ATR submitted by us for the first review. We shall provide clarification to the respective Designated Body, wherever sought and within such timeline, as the Designated Body may stipulate. The Designated Body shall stipulate the timeline in such a manner to ensure that the Designated Body submits the revised ATR to the complainant on SCORES within 10 calendar days of the review sought.

Note: The Designated Bodies shall be responsible for:

- *Monitoring and handling grievance redressal of investors against respective entities under their domain as stipulated in SEBI circular.*
- *Taking non-enforcement actions including issuing advisories, caution letters for non-redressal of investor grievances and referring to SEBI for enforcement actions.*

• **Second Review of the Complaint:**

11. The complainant may seek a second review of the Complaint within 15 calendar days from the date of the submission of the ATR by the Designated Body. In case the complainant is satisfied with the ATR provided by the concerned Designated Body or complainant does not choose to review the Complaint within the period of 15 calendar days, the Complaint shall be disposed on SCORES.
12. In case the complainant is not satisfied with the ATR provided by the Designated Body or the concerned Designated Body has not submitted the ATR within 10 calendar days, SEBI may take cognizance of the Complaint for second review through SCORES.
13. SEBI may take up the review with stakeholders involved, including us or/and Designated Body. We or/and Designated Body shall take immediate action on receipt of second review complaint from SEBI and submit revised ATR to SEBI through SCORES, within the timeline specified by SEBI.
14. SEBI or the Designated Body (as the case may be) may seek clarification on the ATR submitted by the concerned entity for SEBI review complaint. The concerned entity shall provide clarification to the respective Designated Body and/or SEBI, wherever sought and within such timeline as specified. The second review Complaint shall be treated as

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‘resolved’ or ‘disposed’ or ‘closed’ only when SEBI ‘disposes’ or ‘closes’ the Complaint in SCORES. Hence, mere filing of ATR with respect to SEBI review complaint will not mean that the SEBI review complaint is disposed.

NOTE: General provisions regarding investor grievance redressal on SCORES:

1. Investors shall first take up their grievances for redressal with us through their designated persons/officials who handle issues relating to compliance and redressal of investor grievances.

2. Investors who wish to lodge a Complaint on SCORES (complainant) are required to register themselves on www.scores.gov.in by clicking on “Register here” under the “Investor Corner”. While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email id, are required to be provided for effective communication and speedy redressal of the grievances. Upon successful registration, a unique user id and a password shall be generated and communicated through an acknowledgement email to the complainant.

3. In order to enhance ease, speed and accuracy in the redressal of grievance, the investor may lodge the Complaint against any us on SCORES within a period of one year from the date of occurrence of the cause of action, where:

3.1. The complainant has approached us for redressal of the complaint and we have rejected the complaint or the complainant has not received any communication from the concerned Entity; or

3.2. The complainant is not satisfied with the reply received or the redressal by us.

4. If any complaint is filed on SCORES beyond the limitation period specified above, SEBI may reject such complaint.

5. The following types of complaints shall not be dealt through SCORES:

5.1. Complaints against companies which are unlisted/delisted and companies on Dissemination Board of Stock Exchanges (except complaints on valuation of securities).

5.2. Complaints relating to cases pending in a court or subject matter of quasijudicial proceedings, matters pending with Online Dispute Resolution of SEBI etc.

5.3. Complaints falling under the purview of other regulatory bodies such as Reserve Bank of India, (RBI), Insurance Regulatory and Development Authority of India (IRDAI), Pension Fund Regulatory and Development Authority of India (PFRDAI), Competition Commission of India (CCI), or complaints falling under the purview of other ministries.

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5.4. Complaints against a company under resolution under the relevant provisions of the Insolvency and Bankruptcy Code, 2016 (IBC).

5.5. Complaints against the companies where the name of company is struck off from Register of Companies (RoC) or a vanishing company as published by MCA.

5.6. Liquidated Companies or companies under liquidation.

5.7. Complaints which are in the nature of market intelligence i.e., information given to SEBI regarding violation of any of the provisions of the securities laws.

6. Notwithstanding anything specified in this circular, SEBI shall handle the first review complaint for categories of intermediaries where no Designated Body has been appointed for the purpose.

7. The complainant in the event of being dissatisfied shall give reasons for not being satisfied with the ATR and provide clear reasons for review at any stage.

8. SCORES shall only be a facilitative platform for investors to get redressal of their grievances from the concerned entity.

9. In cases where investors raise issues, which require adjudication on any third party rights, on questions of law or fact or which is in the nature of a lis between parties, or if investors are not satisfied with disposal on SCORES post SEBI review, they shall seek appropriate remedies through the Online Dispute Resolution mechanism in securities market. In addition, investors have the option to approach legal forums including civil courts, consumer courts etc.

10. Investors can approach the Online Dispute Resolution mechanism or other appropriate civil remedies at any point of time. In case the complainant opts for Online Dispute Resolution mechanism or other appropriate civil remedies while the complaint is pending on SCORES, the complaint shall be treated as disposed on SCORES.

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LEVEL 3: Online Dispute Resolution

The Securities Exchange Board of India (SEBI) vide circular no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/131 dated July 31, 2023 has introduced a common Online Dispute Resolution ("ODR") mechanism to facilitate online resolution of all kinds of disputes arising in the Indian securities market. The aforesaid SEBI circular / corrigendum can be accessed on the website of SEBI at https://www.sebi.gov.in/legal/circulars/jul-2023/online-resolution-of-disputes-in-the-indian-securities-market_74794.html or on the Company's website at personalfn.com.

The ODR Portal allows investors with additional mechanism to resolve the grievances in the following manner:

In case the investor is not satisfied with the resolution provided at Level 1 or 2, then the online dispute resolution process may be initiated through the ODR portal within the applicable timeframe under law.

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Important Notes:

1. The investors(s) may initiate dispute resolution through the ODR Portal without having to go through SCORES Portal i.e., Level 2, if the grievance lodged with the Company is not resolved.
2. It may be noted that the dispute resolution through the ODR portal can be initiated only if such complaint / dispute is not pending before any arbitral process, court, tribunal, or consumer forum or if the same is non-arbitrable under Indian law.
3. There is no fee for registration of complaints / disputes on the ODR Portal. However, the process of conciliation / arbitration through ODR portal may attract a fee and the same shall be borne by the concerned investor or Company, as the case may be.

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