

RightAlpha Capital Private Limited

Grievance Redressal and Investor Complaint Disclosure Policy

RightAlpha Capital Private Limited

CIN - U65990KA2020PTC135922

SEBI RIA No. - INA200015592

***Galaxy, Unit 2, Electra Block, 1st Floor, Wing A Exora Business Park, Prestige Tech Park
II, Bellandur, Bengaluru – 560037***

Tel: [9108499166]

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1. Introduction

RightAlpha Capital Private Limited (“Company”) is a company incorporated under the provisions of the Companies Act, 2013 and having its registered office at Galaxy, Unit 2, Electra Block, 1st Floor, Wing A Exora Business Park, Prestige Tech Park II, Bellandur, Bengaluru – 560037. The Company is an investment adviser, registered with Securities and Exchange Board of India (SEBI) under SEBI (Investment Advisers) Regulations, 2013 (“Regulations”) bearing the registration number INA200015592.

2. Purpose of the policy

In accordance with the SEBI Circular on Investor Charter and disclosure of Investor Complaints¹, the Company is required to prepare an Investor Charter and disclose investor complaints and publish the same on their website/mobile application.

Further, by means of this Investor Charter, Grievance Redressal and Investor Complaint Disclosure Policy (“Policy”), the Company endeavors to adopt the spirit of the guidance and directives of Regulation 21 of the Regulations and to ensure that it, at all times, is redressing client grievances promptly, disclosing the status of such complaint on a monthly basis and ensure accountability & transparency to the client.

3. Scope and applicability of the Policy

In order to facilitate client awareness about various activities which a client deals with while availing the services provided by the Company, an [Investor Charter](#) has been prepared. This Investor Charter is a brief document containing details of service provided to client, their rights, dos and don'ts, responsibilities, investor grievance handling mechanism and timelines thereof etc.

In order to further enhance transparency in grievance redressal, the Company shall disclose the details of client complaints by 7th of the succeeding month and is present on [website](#).

Further, the Company will ensure to prominently display a notice in its office to inform various ways of grievance redressal available.

4. Details of grievance redressal mechanism and how to access it

4.1 Registration of complaints directly with the Company:

¹ SEBI Circular SEBI/HO/IMD/IMD-II CIS/P/CIR/2 dated December 13, 2021

- i. In case of any grievance / complaint, a client should approach the Company and the Company shall ensure that the grievance is resolved at the earliest subject to a maximum of 30 days.
- ii. The Company will appoint a compliance officer (“**Officer**”) who shall attend to and address any client query/concern/grievance and the Company will ensure, the Officer is vested with the necessary authority and independence to handle clients’ complaints.
- iii. The Officer shall acknowledge the grievance put forward by the client and look into the complaint impartially and without any bias.
- iv. The client may raise its complaint to the following Officer:

Name	Gaurav Garg
Address	Galaxy, Unit 2, Electra Block, 1st Floor, Wing A Exora Business Park, Prestige Tech Park II, Bellandur, Bengaluru – 560037
Telephone No	9108499166
Email id	compliance@rightalphacapital.com

- v. In the event that the client is unsatisfied with the redressal, or the grievance is unresolved within the promised time, the client may escalate the matter to the director of the Company.
 - vi. All the complaints received, their resolution status and the measures taken shall be kept on record.
- 4.2 Client grievances pertaining to financial products in which investments have been made based on investment advice, shall fall within the purview of the regulator of such financial products.

4.3 Registration of complaint on the SCORES website and ODR:

- i. The client can register their complaints through the electronic mode in [SCORES](#).
- ii. At the time of making the complaint, the client will be asked to indicate whether he / she has approached the Company with the complaint before.

Scenario I

- If the client has not approached the Company with the complaint before, a direct complaint will be raised with the Company on the [SCORES](#) portal without any interference from SEBI. The Company shall respond to the client within 30 days failing which the complaint will be escalated to SEBI automatically.
- In the event that the Company has responded and the client is dissatisfied with the response, (s)he shall indicate the same within 15 days of receipt of reply from the Company failing which the complaint will be closed on [SCORES](#). If (s)he indicates his dissatisfaction, the complaint will be escalated to SEBI.

Scenario II

- If the client has approached the Company with the complaint before, the complaint will be escalated directly to SEBI.
- iii. Once a complaint comes to SEBI, it may, after examination, forward the complaint to the Company with an advice to send a written reply to the client and file an Action Taken Report (ATR) in [SCORES](#) within 30 days.

- iv. The complete and proper ATRs, along with supporting documents, will be updated electronically by the Company on [SCORES](#). The proof of dispatch of the reply of the Company to the complainant will also be uploaded in [SCORES](#) and preserved for future reference.
- v. A client may lodge a complaint on [SCORES](#) within three years from the date of cause of complaint, where the client has approached the Company for redressal of the complaint and, the complaint has been rejected by the Company, or the complainant did not receive any communication from the Company, or the complainant is unsatisfied with the reply given to him or redressal action taken by the Company.
- vi. The [SMART ODR Portal](#) is being made available for investors and Intermediaries on <https://smartodr.in/login>. ODR Portal will be implemented in phases. The ODR Portal offers a user-friendly platform to file complaint/dispute for resolution through online conciliation and arbitration as per the below procedures:
 - a. For any unsatisfied outcome of any grievance taken up with the market participant and further escalating through the SCORES portal; if the investor is still not satisfied, he/she can initiate dispute resolution through ODR portal after exhausting these options.
 - b. Alternatively, investor/client may initiate dispute resolution through ODR portal, if the grievance lodged with the concerned Market Participant was not satisfactorily resolved or at any stage of the subsequent escalations mentioned in the point (a) above (prior to or at the end of such escalation/s). The concerned Market Participant may also initiate dispute resolution through the ODR Portal after having given due notice of at least 15 calendar days to the investor/client for resolution of the dispute which has not been satisfactorily resolved between them.

4.4 Registration of physical complaints with SEBI

Clients may send their physical complaints to: Office of Investor Assistance and Education, Securities and Exchange Board of India, SEBI Bhavan, Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051.

4.5 Dispute Resolution Mechanism

Any dispute between the Company and its client may be resolved through arbitration, as agreed between them in their respective investment advisory agreement or through an Ombudsman authorized or appointed for the purpose by any regulatory authority, as applicable.

5. Clarifications

In case any further information /clarifications required in this regard, the Compliance Officer may be contacted.

Name: Gaurav Garg

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6. *Review Of Policy*

This Policy will be reviewed on an annual basis or earlier in light of the changes in regulatory framework or for business or operational reasons.
