

INVESTOR GRIEVANCE REDRESSAL POLICY

1. OBJECTIVE

The objective of the policy is to address the grievances of the customers. One of the core value of our company is "Customer first" and we ensure that customers are satisfied with the services rendered by us. This policy has been formulated in order to ensure that grievances of the customers are effectively & timely redressed.

2. POLICY

The company has a separately designated investor grievances email id grievances@newberry.in on which the client or investor can lodge a complaint. The designated email-id is displayed on the website of the Company www.newberrycapitals.in and printed prominently on the Notice Boards displayed at the Branch, Sub–Broker and Authorised Person's office, printed on various KYC forms contract notes, holding statements and other communications sent to Clients. The company has a Compliance Department at its corporate office with requisite staff strength headed by the Compliance Officer.

RECEIPT OF COMPLAIN

New Berry can receive client complaint either directly from client - in any of the modes viz physical letters, fax, e-mail, phone and personal visit. Further, clients' complaints are also received through SCORES, Regulatory authorities, Advocates, Consumer forums etc.

Handling of all investor grievances is a centralized function and is being handled by Compliance Department at the Corporate office of the company.

RECORDING OF COMPLAIN

Register of Complaints is maintained in accordance to the rules, regulations, Bye laws and directives of the Exchanges/SEBI stating complete detail of complaints including name of originating branch, sub-broker, authorized person etc.

All the Investors complaints are recorded immediately in Investor Grievance Register maintained separately for each Exchange and Depository. The Complaint received either physically or electronically by email shall be filed serially. The Compliance Officer will be responsible for receiving and recording all the Investor complaint.

HANDLING OF COMPLAINT

It will be the duty of Compliance Officer to ensure that the complaints received from investors are redressed earliest and without delay.

All the Investor Grievances received are verified and scrutinized by the compliance department. On receipt of the complaint, the Compliance Officer can seek further information from the complainant and also seek any details/information from the concerned department/ officials/Sub-Brokers/Authorised Person for



verification against allegations made in the complaint. If there is no response from concerned department/officials/Sub-Broker/Authorised Person within 7 working days of the complaint, the same is escalated to Managing Director.

The company has set a target period of maximum 30 days for redressal of any complainant and providing prompt reply to the Investor.

Once the complaint is resolved/closed, the Compliance Officer gives the sign-off.

REVIEW OF COMPLAINT

The Compliance Officer regularly monitors and reviews complaints according to its nature, originating branch, against a particular employee and/or sub-brokers, authorized person etc. and on the basis of such analysis, inform the management to take adequate steps to strengthen the systems.

The Managing Director reviews the status of pending complaints. The

Internal Auditors review grievances status on a periodic basis.

A MIS of the complaints received, pending and resolved during the Quarter are placed before the Board of Directors of the company for their review and necessary advice.

3. MAINTAINENCE OF RECORDS

The Complaint Register will be maintained for such period as prescribed by regulatory authority.

4. REVIEW OF THE POLICY

This policy is to be reviewed as & when management thinks fit or whenever changes are mandated by statutory authorities.

