



INVESTOR GRIEVANCE POLICY

POLICY FOR INVESTOR GRIEVANCE POLICY

This Policy for Investor Grievance which is reviewed and approved by the Board of Directors of the company in its Board Meeting dated 30th April, 2025.

1. Purpose:

This Investor Grievance Redressal Policy has been formulated in compliance with the SEBI (Merchant Bankers) Regulations, 1992, to ensure fair, transparent, and timely resolution of investor complaints. It outlines the internal process for addressing and resolving investor grievances arising from merchant banking activities.

2. Scope:

This policy covers complaints relating to:

- Public issue management (book-building or fixed-price issues);
- Rights issues;
- Buyback and open offer management;
- Delisting offers;
- Corporate advisory services related to securities market;
- Other SEBI-regulated activities of the merchant banker.

3. Grievance Redressal Mechanism

3.1. Nodal Officer

The Company has appointed a **Compliance Officer** as the designated Nodal Officer responsible for investor grievance redressal.

Name: Mr. Mohit Goyal;

Designation: Compliance Officer

Email: mb.investorgrievance@swastika.co.in;

Contact No.: +0731 – 6644244.

3.2. Modes of Receiving Complaints

Investor grievances can be submitted through any of the following modes:

- SEBI's SCORES platform: <https://scores.gov.in>;
- Company website complaint form;
- Email to the Compliance Officer;
- Postal mail to the registered office;
- Telephonic complaints (subject to confirmation in writing).

3.3. Timeline for Redressal

Stage	Timeline
Acknowledgement of complaint	Within 2 working days
Investigation and interim reply	Within 7 working days
Final resolution (if no further info required)	Within 30 working days

If any additional documentation is required, the investor shall be informed within 7 working days of receipt.

3.4. Record-Keeping

A Complaint Register (manual/digital) shall be maintained recording:

- Date of receipt
- Complainant's details
- Nature of grievance
- Status and date of resolution
- Remarks, if any

3.5. SCORES Compliance

The Company shall maintain an active account on the SEBI Complaints Redress System (SCORES) and respond to all grievances filed on the platform within the stipulated timelines.

4. Escalation Matrix

If a complaint is not resolved within 30 days or the investor is not satisfied with the resolution:

- It shall be escalated to the **Chief Compliance Officer** and **Principal Officer;**
- Periodic reports shall be submitted to the Board and SEBI, as applicable.

5. Reporting and Disclosures

- Summary of complaints and resolutions shall be submitted to SEBI periodically;

6. Review and Update

This policy shall be reviewed annually and updated as required by changes in SEBI regulations or internal process improvements.