

COMPLAINT HANDLING AND GRIEVANCE POLICY- GIFT CITY UNIT

Version 2.00

Recommended for review and approval.



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Axis Trustee Services Ltd.,
Approved by Board of Directors/Committee
On :- 09.01.2026



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AXIS TRUSTEE

Version History

Version	Review Date	Policy Owner	Authored by	Reviewed/ Proposed by	Approved by	Change description
1	January 10, 2025	Giff City Branch	Secretarial Dept.	Legal Head and MD & CEO	Board	Adoption of the Policy
2	January 09, 2026	Giff City Branch	Secretarial Dept.	Compliance and MD & CEO	Board	Annual Review- No change

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COMPLAINT HANDLING AND RESOLUTION POLICY

Gift City Branch

1. Preamble:

A complaint is an expression of dissatisfaction with a product or service, either orally or in writing, from a client/customer. The clients/customers of the Gift City Branch are Borrowers, Issuers of debt instruments. Being the service provider in a fiduciary capacity the company is obligated to serve the interest of the beneficiaries of the underlying transactions (viz., Lenders, Investors).

This policy aims to ensure that the Axis Trustee Services Ltd. ('ATSL') Gift City Branch provides the level of service deserved by clients and beneficiaries and to preserve its reputation in the market and adheres to applicable rules and regulations.

2. Regulatory Requirements / References:

- The International Financial Services Center Authority Regulations, 2019 including any amendments.
- The International Financial Services Center Authority (Capital Market Intermediary) Regulations, 2025 including any amendments.
- IFSCA circular on Complaint Handling and Grievance Redressal by Regulated Entities in the IFSC December 02, 2024, including any amendments time to time (This circular shall not apply to a Foreign University, a Foreign Educational Institution, an Ancillary Service Provider, a BATF Service Provider, a Finance Company / Finance Unit engaged in aircraft leasing or ship leasing and global/regional corporate treasury centre in the IFSC.)

3. Ownership & Policy Administration

The primary ownership of Complaint Handling Policy is with the Compliance Department. The Compliance Department shall translate Regulatory directives, guidelines into policy. The responsibility of implementing this policy is with the Principal Officer, Gift City Branch.

An indicative list of complaints is given hereunder:

Client/beneficiary related:

- Non receipt of due interest/ redemption by Lender/ investor
- Non creation or inordinate delay in creation of security
- Breach of covenants/ terms of issuance or underlying transaction documents
- Delay or noncooperation in providing reports/data/information for the investors Lenders.
- Delay in finalization/ execution of documentation.

Company related:

- Unprofessional or unsolicited behavior of an employee
- Delay in processing requests for issuance of NOCs / Convening of Meetings etc.,
- Non submission/delay in providing the documents/data required by the Lenders/Investors.
- Other service issues.
- Any issue other than those specified above may also be considered as complaint at the discretion of the Managing Director & Chief Executive Officer (MD & CEO).

Which are the matters that are not considered as complaints by Gift City Branch - ATSL?

- Complaints that are incomplete or not specific
- Allegations without supporting documents/ proof.
- Seeking guidance/explanation



4. Applicability

This policy is applicable to all offices, all services rendered by the Gift City Branch and all personnel working at the offices of ATSL Gift City Branch.

5. Objective

To ensure that complaints are resolved in a time-bound, efficient, and professional manner with the aim of promoting highest standards of client service and ensuring client satisfaction.

The policy aims to provide assistance to the clients/beneficiaries who have lodged complaints and to train the ATSL staff for dealing with complaints. The policy demonstrates:

1. ATSL is committed to efficient and fair resolution of complaints by its staff at all levels.
2. ATSL recognizes the need to be fair to both the complainant and the employee of the Company against whom the complaint is lodged.
3. ATSL attaches importance to handling complaints and has therefore delegated authority to senior functionaries in the organization for resolving complaints.
4. All complainants shall be treated courteously, and complaints shall be dealt with expeditiously within the prescribed timelines to the satisfaction of the clients/beneficiaries.
5. Complaints and resolution thereof will be recorded in the Complaints Register for debenture trustee business in Investors Grievance Register [maintained in either a hard or soft copy] at the Gift City Branch - ATSL.

6. Receiving a Complaint

All complaints are to be directed to the Complaints Redressal Officer (CRO). The dedicated mail ID for this purpose is complaints-giftcity@axistrustee.in, which shall also be made available on ATSL website.

In case grievances/complaints are received or raised directly with any Dept., the same shall be forwarded to the Complaints Redressal Officer (CRO) with copy to the Chief Compliance Officer - CO, before 5.00 pm same day.

7. Complaints Redressal Officer (CRO) & Complaints Redressal Appellate Officer (CRAO).

1. Compliance Redressal Officer or CRO shall be an employee of the regulated entity responsible for handling of complaints received from its consumers.
2. Complaint Redressal Appellate Officer or CRAO shall be a senior level person of the Regulated Entity Designated for handling appeals of consumers against the decision taken by the Complaint Redressal Officer of the Regulated Entity. An Officer designated by MD & CEO will act as Complaints Redressal Appellate Officer.

8. Responsibility of the Complaints Redressal Officer (CRO)

On receipt of a complaint on the Complaints email Id an auto generated acknowledgement of receipt of complaint is sent to the complainant. The CRO along with the dealing officer of the concerned Servicing /Operation/ relevant team will ensure that all the complaints received are resolved within the prescribed regulatory timeline.

If the complaint is lodged against the Issuer of debt securities, the same should be forwarded immediately to the CRO with copy to the Chief Compliance Officer - CO. The dealing officer for the issuer should be contacted by the CRO on the same day for priority resolution with such Issuers.

The dealing officer shall strive to get resolution of the complaint by constant communication with the Issuers within 15 days of the receipt of Complaint but not later than 30 days of acceptance of complaint. Where the complaint like non-payment of interest / redemption amount or non-creation of security cannot be resolved within reasonable time, the beneficiary/client must be advised suitably.

If a complainant is not satisfied with the resolution provided by the Regulated Entity or if the complaint has been rejected by the Regulated Entity, the complainant may file an appeal before the CRAO of the Regulated Entity preferably within 21 days from the receipt of the decision from the CRO. The CRAO shall dispose of the Appeal within a period of 30 days.

Where a complainant is not satisfied with the decision of the Regulated Entity and has exhausted the appellate mechanism of the Regulated Entity, he may file a complaint before the Authority through email to grievance-redressal@ifsc.gov.in preferably within 21 days from the receipt of the decision from the Regulated Entity

In case of direct complaints against, Gift City Branch - ATSL [except those relating to employee deficiency in services], the grievance shall be taken up by the CRO, on priority basis for resolution under guidance of the Chief Compliance Officer-CO. In the case of direct complaint relating to deficiency in services, the Chief Operating Officer (COO)-CO will examine and submit the report to the MD & CEO for necessary action.

9. Online system for complaint handling

A Regulated Entity may choose to develop an online system for complaint handling depending upon the nature, scale and complexity of its business along with its size and organizational structure.

10. Time Frame for resolution of complaints/grievances

On receipt of a complaint, CRO of the Regulated Entity shall make an assessment on the merits of the complaint. Pursuant to assessment,

- i. In case of acceptance, the Regulated Entity shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
- ii. In case of non-acceptance, the Regulated Entity shall inform the complainant within 5 working days along with reasons.
- iii. The Regulated Entity shall dispose of complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint. The Regulated Entity may either resolve the complaint or reject the complaint.

11. Disclosure on website

The policy on Complaint Handling and Grievance Redressal shall be prominently disclosed on the website of the Regulated Entity or on a dedicated webpage of its Group Entity, as applicable, under the heading "**Complaint Handling and Grievance Redressal**". The name and contact details of the "**Complaint Redressal Officer**" and the "**Complaint Redressal Appellate Officer**" shall also be prominently displayed.

12. Record keeping & Complaints Register

The Complaint Redressal Officer is responsible to ensure that all complaints received are recorded. The copy of the complaints along with copies of all relevant documents shall be maintained by the CRO. The confirmation of resolution of complaint, if any, be sent to the complainant.

The Complaint Register and Investor Grievance register will be maintained (in the Excel) with the following particulars:

- Full Name of the Complainant along with the date of Complaint.
- Internal complaint number along with the date of receipt.
- Name of Issuer/ Company Name against whom complaint raised.
- Issue Details. All correspondence exchanged between the Regulated Entity and the complainants.
- Holding details including ISIN Numbers.
- Nature & Brief Description of Complaint / Follow-up action.
- All information and documents examined and relied upon by the Regulated Entity while processing of the complaints.



- Status of Compliant i.e., Resolved/Unresolved including actual date of redressal.
Timelines for processing of complaints
- Reasons for rejection of complaints if any
- Data of all complaints handled by it

13. Employee Training & Awareness

Gift City Branch-ATSL would have an ongoing employee training program on Grievance Redressal Mechanism so that all the staff are adequately trained. Appropriate channels / modes of training would be adopted for imparting training. Training requirements would have different focuses for compliance staff and staff dealing with products, services and customers.

14. Miscellaneous

The compliance requirements under this circular are in addition to the requirements on grievance redressal contained in any other regulations specified by the Authority. Where any provision of this circular is in contradiction with any provision of the applicable Act, Rule or Regulation, the provisions of the said Act, Rule or Regulation shall prevail.

15. Review of the Policy

This policy shall be reviewed annually and placed before the Board for approval. The changes, if any, to the existing Guidelines and Regulations shall be brought to the notice of all concerned and Policy be updated suitably. The reviewed policy shall be made available for information of all employees.

END

