

Grievance Redressal Policy

(For Bajaj Capital Limited – AMFI-registered Mutual Fund Distributor, online onboarding platform)

1. Our Commitment

At Bajaj Capital Limited (BCL), we value your trust. If you face any problem while using our online platform — from account opening to transactions — we promise to handle your complaint quickly, fairly, and transparently.

2. Purpose & Regulatory Anchors

This Policy explains how **BCL** receives, records, investigates, resolves, and reports investor complaints arising through its **online platform (web and mobile)** as well as through assisted channels such as email, phone, and branch interactions. The purpose of this Policy is to:

- Provide investors with a **clear, fair, and time-bound mechanism** to raise and resolve grievances.
- Ensure that complaints are handled in a **transparent, consistent, and efficient manner**.
- Strengthen investor confidence by demonstrating BCL's commitment to **responsible distribution practices** and **regulatory compliance**.
- Capture insights from complaints to **improve systems, processes, and customer experience** on a continuous basis.

This Policy has been designed in line with the **Association of Mutual Funds in India (AMFI) Code of Conduct for Distributors**, the **Securities and Exchange Board of India (SEBI) grievance redressal framework** including **SCORES (SEBI Complaints Redress System)** and its integration with the **SEBI Online Dispute Resolution (ODR) platform**, as well as requirements under the **Digital Personal Data Protection Act, 2023** for safeguarding investor information. Where a grievance relates to cyber-security, BCL also follows **CERT-In guidelines** for timely reporting and corrective action.

Together, these regulatory anchors ensure that every investor grievance raised through Bajaj Capital's platform is handled not only with **speed and fairness**, but also in **full compliance with applicable laws and industry best practices**.

2) Scope & Definitions

This Policy applies to **all complaints and grievances raised by existing or prospective customers/clients** of BCL in its capacity as an AMFI-registered mutual fund distributor. It covers issues arising from the use of BCL's **online onboarding platform (web and mobile application)** as well as assisted service channels.

The scope includes, but is not limited to, the following categories of complaints:

1. Onboarding & KYC Related

- KYC / KRA rejections or delays
- FATCA / CRS declaration errors
- PAN–Aadhaar linkage, name mismatches, or data corrections

2. Banking & Payment Mandates

- UPI mandate creation or failure
- ECS/NACH mandate setup and rejections
- Net banking or BBPS payment failures, double debits, or delays in credit

3. Transaction Processing

- Issues with purchase, redemption, switch, SIP, STP, or SWP transactions
- Missed or incorrect cut-off timings
- Transactions executed in the wrong option, plan, or folio
- Delayed confirmations or non-receipt of units

4. Folio & Account Management

- Folio mapping errors or consolidation requests
- Change of broker/distributor code requests
- Incorrect personal or nominee details appearing in folios

5. Charges, Commissions & Disclosures

- Clarifications on transaction charges, trail commissions, or other levies
- Non-disclosure or incorrect disclosure of costs or distributor benefits

6. Platform & Communication Issues

- Difficulty accessing the app/website, login errors, or downtime
- Missing or delayed transaction statements, reports, or account confirmations
- Errors in alerts, SMS, email communications, or app notifications

7. Data Protection & Security

- Suspected unauthorised access or misuse of personal data
- Investor requests relating to access, correction, or deletion of personal data
- Breaches or incidents impacting privacy or platform security

Exclusions:

This Policy does **not** cover complaints related to:

- Scheme performance, NAV movement, or portfolio returns (which are dependent on market risks)
- Product design or fundamental attributes of mutual fund schemes (which are under the purview of the respective Asset Management Companies and their RTAs)
- Disputes already under legal proceedings or arbitration

In such cases, BCL will **guide and assist investors** in approaching the relevant AMC, RTA, or regulatory forum while continuing to provide necessary support.

3) How to Raise a Complaint in Our App / Website

- For Customers/Clients using *OnlineMF portal* at <https://onlinemf.bajajcapital.com/> :
 - a) A call can be made at the toll free number i.e 1800-313-123-123. The said number is provided at the top right corner of the aforementioned webpage.
 - b) An email can be written at mfconnect@bajajcapital.com. The said email id is provided in the footer throughout all the webpages which the client can see after successful login.
- For Customers/Clients using *AMEYA* web or mobile application:
 - a) A call can be made at the toll free number i.e 1800-313-123-123. The said number is provided in AMEYA Web platform and AMEYA Mobile App.
 - b) An email can be written at ameya@bajajcapital.com. The said email id is provided at in AMEYA Web platform and AMEYA Mobile App.

4) Acknowledgement, TATs & Status Tracking:

- **For Customers/Clients using *OnlineMF portal* at <https://onlinemf.bajajcapital.com/> and lodging request/complaint through aforementioned channels:**
 - ✓ Acknowledgement: **within 24 hours**
 - ✓ First update/Provisional response: **within 4 business days**
 - ✓ Resolution target: **within 7 calendar days** (if more time is needed due to dependencies on AMCs/RTAs/UPI/Bank/Payment Aggregators, BCL will provide reasons and revised ETA).
- **For Customers/Clients using *AMEYA* web or mobile application and lodging request/complaint through aforementioned channels:**

✓ Acknowledgement, First response and Resolution target:

Group - Type - Sub Type wise TAT Definition						
Group	Type	Sub-Type	Keywords	Ticket owner(Specify one name only)	FRT	Resolution TAT (Days)
Mutual Fund	Query	Auto AR Issue/ Transaction	Round Robin	Sunil	6 hrs	2 Days
Mutual Fund	Query	Customization request	Round Robin	Sunil	6 hrs	3 days
Mutual Fund	Query	Duplicacy of Investors	Round Robin	Beena	6 hrs	2 Days
Mutual Fund	Query	Family Mapping	Round Robin	Sunil	6 hrs	2 Days
Mutual Fund	Query	Folio demerging	Round Robin	Sunil	6 hrs	2 Days
Mutual Fund	Query	Issue in MF Margin	Round Robin	Sunil	6 hrs	3 days
Mutual Fund	Query	Login Related	Round Robin	Beena	6 hrs	2 Days
Mutual Fund	Query	MF Transactions error	Round Robin	Sunil	6 hrs	1 Day
Mutual Fund	Query	Partial Portfolios	Round Robin	Sunil	6 hrs	3 days
Mutual Fund	Query	Registration of Multiple Users	Round Robin	Beena	6 hrs	2 days
Mutual Fund	Request	Additional Bank	Round Robin	Beena	6 hrs	1 day
Mutual Fund	Request	CAS Import	Round Robin	Sunil	6 hrs	2 days
Mutual Fund	Request	Client Mapping	Round Robin	Beena	6 hrs	2 Days
Mutual Fund	Request	Data Sync error in Ameya	Round Robin	Sunil	6 hrs	2 Days
Mutual Fund	Request	Mandate /KYC Issue	Round Robin	Sunil	6 hrs	1 day
Mutual Fund	Request	Nominee Issue	Round Robin	Beena	6 hrs	1 day
Mutual Fund	Request	Portfolio Value Mismatch	Round Robin	Sunil	6 hrs	2 days
Mutual Fund	Request	Removal of Duplicate User ID	Round Robin	Sunil	6 hrs	2 Days
Mutual Fund	Request	SIP Cease/Modification request	Round Robin	Sunil	6 hrs	2 Days
Mutual Fund	Request	User ID Creation	Round Robin	Beena	6 hrs	2 Days

Note: If more time is needed due to dependencies on AMCs/RTAs/UPI/Bank/Payment Aggregators, BCL will provide reasons and revised ETR (Expected time for resolution).

5) Escalation Matrix (Internal)

If dissatisfied or TAT breached, escalate with the Complaint ID:

- For Customers/Clients using *OnlineMF portal at* <https://onlinemf.bajajcapital.com/> and lodging request/complaint through aforementioned channels:

Product	SPOC for confirming escalation matrix	Ticket Category	Ticket Sub Category	Default Ticket Assignee	Expected SLA	Escalation 1	Expected SLA	Escalation 2	Expected SLA
OnlineMF	Priya Yadav and Anshuman Singh	Queries	Online MF A/C opening related Queries	Sunil Pandey (sunil.p@bajajcapital.com)	24 Hours	Harsh Mohan (harshn@bajajcapital.com)	24 Hours	Deepak Kumar Gupta (deepakgupta@bajajcapital.com)	24 Hours
OnlineMF	Priya Yadav and Anshuman Singh	Queries	Offline & Online KYC related Queries		24 Hours		24 Hours		24 Hours
OnlineMF	Priya Yadav and	Queries	Offline/Physical mandate		24 Hours		24 Hours		24 Hours

	Anshuman Singh		related Queries						
OnlineMF	Priya Yadav and Anshuman Singh	Queries	RM/Folio mapping related Queries offline/online	Deen Dayal (deend@bajajcapital.com)	24 Hours	Harsh Mohan (harshn@bajajcapital.com)	24 Hours	Deepak Kumar Gupta (deepakgupta@bajajcapital.com)	24 Hours
OnlineMF	Priya Yadav and Anshuman Singh	Queries	Transaction Processing on Online MF Queries	Pawan Kumar(p kumar@bajajcapital.com)	24 Hours	Harsh Mohan (harshn@bajajcapital.com)	24 Hours	Deepak Kumar Gupta (deepakgupta@bajajcapital.com)	24 Hours
OnlineMF	Priya Yadav and Anshuman Singh	Queries	SIP execution & Bounce related Queries		24 Hours		24 Hours		24 Hours
OnlineMF	Priya Yadav and Anshuman Singh	Queries	E-mandate registration issues		24 Hours		24 Hours		24 Hours
OnlineMF	Priya Yadav and Anshuman Singh	Queries	Transaction rejection clarification		24 Hours		24 Hours		24 Hours
OnlineMF	Priya Yadav and Anshuman Singh	Queries	Any Query other than above given list for Online MF	Harsh Mohan (harshn@bajajcapital.com)	24 Hours	Priya Yadav (priya.yadav@bajajcapital.com)	24 Hours	Anshuman Singh (anshuman.singh@bajajcapital.com)	24 Hours

➤ **For Customers/Clients using AMEYA web or mobile application and lodging request/complaint through aforementioned channels:**

	Level 1	Level-2	Level-3
Name	AMEYA	Mr. Vijay Thapliyal	Mr. Sanjeev Kumar G.
Email Id	Support Team	vijaythapliyal@bajajcapital.com	sanjeev.g@bajajcapital.com

6) Linkage with External Redress Mechanisms

- **SCORES:** If the customers/clients remain dissatisfied after engaging with BCL, they may lodge a complaint on SCORES at <https://scores.gov.in/scores/Welcome.html>. BCL will respond on the portal within SEBI-prescribed workflows.
- **SEBI ODR Portal:** Post-SCORES or where directed, investors can opt for online conciliation/arbitration via the common ODR portal per circulars dated **July 31, 2023** (updated **Dec 28, 2023**) and **Sep 20, 2023**.

7) Communication Standards

- To explain things **politely, clearly, and without jargon**. If a rule or cut-off time applies, the same can be mentioned.
- To share **all important updates** about customer/client's complaint through **in-app notifications or email or SMS**.
- To involve **AMC, RTA, bank, or payment partner**, if required and coordinate on behalf of the customer/client until the issue is resolved.

8) Record-Keeping, MIS & Disclosure

Record-Keeping, Reporting & Disclosures

i. Central Complaint Register

- a. All complaints received through the app/website, email, phone, post, or in-person are recorded in a **centralised ticketing system**.
- b. Each complaint entry includes a **unique Complaint ID, investor details, date/time of receipt, description, category/sub-category, supporting documents, actions taken, status updates, and closure remarks**.
- c. The system maintains a complete **audit trail** of acknowledgements, communications, escalations, and resolutions to ensure transparency and traceability.
- d. Complaint records are retained for the period prescribed under applicable laws, SEBI circulars, and internal data retention policies.

ii. Management Information System (MIS) & Internal Reporting

- a. A **monthly MIS** is prepared and submitted to the Compliance Officer and Senior Management, covering:
 - i. Number of complaints received, resolved, and pending

- ii. Ageing analysis of open complaints (by days outstanding)
 - iii. Root Cause Analysis (RCA) of recurring issues
 - iv. Nature of complaints (by category/sub-category)
 - v. Corrective and preventive actions implemented
- b. Significant or high-risk complaints (for example, those involving mis-selling, regulatory breaches, or data privacy concerns) are highlighted separately and escalated immediately to management.
- c. The MIS is also used to identify **systemic issues** and guide **process or technology improvements**.
- iii. **Regulatory & External Reporting**
 - a. BCL will comply with reporting requirements prescribed by **AMFI** and the **Securities and Exchange Board of India (SEBI)** regarding classification, resolution, and disclosure of investor complaints.
 - b. Data may be provided to AMFI, SEBI, or other authorities on request or through regular submissions, as applicable.
 - c. Complaints escalated to **SCORES (SEBI Complaints Redress System)** or resolved through the **SEBI Online Dispute Resolution (ODR) platform** will be tracked, recorded, and reported in accordance with SEBI's prescribed workflows.
- iv. **Public Disclosures (Website / App)**
 - a. The following details will always be displayed prominently on BCL's website and mobile app (Support/Help section and footer):
 - i. Contact details of the Grievance Officer
 - ii. Escalation matrix with timelines (TATs) for each level
 - iii. Link to SEBI's SCORES portal
 - iv. Note on availability of SEBI's ODR mechanism
 - b. These details will be **kept up to date**. Any change in grievance officer details, timelines, or escalation process will be promptly reflected in the disclosures.
- v. **Periodic Review & Assurance**
 - a. The Compliance team will periodically review the central register, MIS trends, and disclosure content to ensure accuracy and compliance.
 - b. Independent audit or internal review may be conducted to confirm the effectiveness of grievance redressal processes.

9. Data Protection & Security

1. Data Minimisation & Consent

BCL will collect and process only such personal data of investors as is **necessary for lawful purposes** including onboarding, KYC/KRA compliance, transaction processing, reporting, and grievance resolution.

- Consent will be obtained and recorded in compliance with the **Digital Personal Data Protection Act, 2023 (DPDPA)** and Ministry of Electronics and Information Technology (MeitY) guidelines.
- Investors will be provided with clear options to **access, correct, update, or delete** their personal data, and to **withdraw consent** where permissible under law.
- All requests for exercising these rights will be logged, acknowledged, and fulfilled within statutory timelines, with audit trails maintained.

2. Technical & Organisational Safeguards

- BCL will adopt **industry-standard security controls** including but not limited to encryption, firewalls, access controls, periodic vulnerability assessments, and secure application development practices.
- Access to personal data is role-based and restricted to authorised personnel only.
- Systems and databases are monitored for suspicious activities, with incident detection and escalation protocols in place.

3. Incident Reporting & CERT-In Compliance

- In the event of a cyber incident (such as unauthorised access, data leakage, denial of service, or compromise of investor accounts), BCL will activate its **Incident Response Plan**.
- Where the incident is “notifiable” under the **CERT-In Directions, 2022**, it will be reported to CERT-In within **6 hours of detection**, along with supporting evidence and logs.
- Detailed evidence chains will be preserved for regulatory reporting, root cause analysis, and remediation.
- Affected investors will be notified where legally required, with guidance on precautionary steps to secure their accounts.

10. Training & Governance

1. Mandatory Staff Training

- All employees in **Investor Services, Sales, Product, Technology, and Compliance** functions will undergo training on:
 - The **AMFI Code of Conduct for Distributors**
 - Internal grievance handling protocols and escalation procedures
 - Data protection and information security obligations under the **DPDPA** and CERT-In Directions
 - Use of platform logs and telemetry in complaint investigations
- Training will be part of **new-employee induction** and **annual refresher modules**, with completion tracked by HR/Compliance.

2. Governance & Continuous Improvement

- A **quarterly review** of grievance data will be undertaken by the Grievance Redressal Committee/Compliance team to identify trends, systemic gaps, and recurring issues.
- Outcomes of this review will feed into **process improvements** such as:
 - clearer error messages,
 - contextual help text,
 - reduction of mis-clicks or transaction failures, and
 - streamlined complaint forms.
- Key findings and corrective actions will be reported to Senior Management and, where material, to the Board.

11. Policy Review

- This Grievance Redressal Policy will be reviewed on an **annual basis** or earlier if:
 - there are changes in regulations issued by **SEBI, AMFI, DPDPA, or CERT-In**;
 - directed by internal or external audit findings; or
 - significant changes occur in BCL's technology platform or grievance-handling process.
- The review will be carried out jointly by the **Compliance Officer** and **Grievance Redressal Committee**, with approval from Senior Management/Board.

- This policy is approved by the Board of Directors in its meeting held on September 29, 2025.
- A record of all past versions of this Policy will be maintained for regulatory and audit reference.