

INVESTOR GRIEVANCE REDRESSAL POLICY

*[Adopted in accordance with SEBI (Merchant Bankers) Regulations, 1992
as amended from time to time and Master Circular dated September 26, 2023, for Merchant Bankers
Registered with SEBI]*

A. PREAMBLE:

1. This document shall be called “Investor Grievance Redressal Policy” or “Policy” of Erudore Capital Private Limited (“Company”)
2. This Policy has been framed in accordance with the provisions of accordance with SEBI (Merchant Bankers) Regulations, 1992 as amended from time to time and Master Circular dated September 26, 2023, for Merchant Bankers Registered with SEBI, which stipulates that every Merchant Banker shall formulate a Investor Grievance Redressal Policy for appropriately disposing with the Investor Complaint.

B. APPLICABILITY:

This Policy applies to Erudore Capital Private Limited.

C. OBJECTIVE:

This Policy is formulated:

- With a view to maintain high Standard of governance, to include and recognize the virtues of compliance and accountability.
- And for speedy and effective resolution of claims, differences and disputes filed by the Investors.

D. DESIGNATED COMPLIANCE OFFICER:

1. Company Secretary of the Company is designated as the Compliance Officer under SEBI (Prohibition of Insider Trading) Regulations, 2015 and this Policy.
2. Compliance Officer shall be responsible for the implementation and compliance of this Policy.

E. INVESTOR CHARTER:

The Company herewith adopts that Investor Charters as specified in the Master Circular dated September 26, 2023, for Merchant Bankers Registered with SEBI, and further shall make the same available on the company’s website at www.erudorecapital.com.

The Investor Charters relates to various capital market transactions as mentioned herein under;

1. Initial Public Offer (IPO) and Further Public Offer (FPO) including Offer for Sale (OFS);
2. Rights Issue;
3. Qualified Institutions Placement (QIP);
4. Preferential Issue;
5. SME IPO and FPO including OFS;

6. Buyback of Securities;
7. Delisting of Equity Shares; and
8. Substantial Acquisitions of Shares and Takeovers.

These Investor Charters provide investors an idea about the various activities pertaining to primary market issuances as well as exit options like Takeovers, Buybacks or Delisting at one single place and also specify the times to be followed by intermediaries to resolve any investor complaint in the course of the aforementioned capital market transactions.

F. STANDARD INVESTOR GRIEVANCE MECHANISM:

With a view to ensure speedy and effective resolution of claims, differences and disputes, the Company had laid down the following redressal mechanism:

1. The Company has a dedicated investor grievances email id i.e investor@erudorecapital.com on which the investors can directly send any complaint/ grievance through an email. The said e-mail ID shall also be displayed on the official website of the Company www.erudorecapital.com.
2. Any email related to a grievance/complaint shall be sent to the Compliance Officer of the Company along with a copy marked to the Principal Officer of the Company i.e., vishal@erudorecapital.com.
3. The Compliance Officer shall follow up the email with the respective department for and ensures appropriate actions on the same.
4. The full details of the written complaint shall be passed to the concerned department by the Compliance Officer.
5. Other than the dedicated email, the investor may also send a written complaint through a letter directly to Company addressing the same to the Compliance Officer, who shall follow the same procedure as given above in respect of the E-mail based complaint.
6. The Compliance Officer shall also maintain a Register of Investor Grievances in which primary details of every complaint shall be entered.
7. The concerned department with the assistance of the Compliance Officer shall obtain all information available on the complaint, which is considered necessary for a proper investigation, look into the necessary information and make possible attempts to resolve the same.
8. If the complaint involves sourcing information and carrying out investigation at Company level, then the same is to be resolve within 15 working days, except any complicated cases, which the Compliance Officer and the concerned department believe would take more time. However, if the complaint involves sourcing information and carrying out investigation from third parties, the Company shall try to resolve the complaint as soon as possible depending on the availability of information from the said third parties. On the Company's part, the Compliance Officer shall do the necessary follow-up in regard to the complaints with the concerned parties.

9. Any serious complaint should be referred to the Investor Grievance Redressal Committee of the Company by the Compliance Officer. The member of the Investor Grievance Redressal Committee shall be Mr. Vishal Kumar Garg and Mrs. Sneha Garg. Any serious complaint shall be referred to the aforesaid committee within 3 days from the day the compliance officer declares the same as to be referred. The committee shall take up the matter on an urgent basis and shall resolve the matter within 7 days other than the matters as discussed in point 8 of the policy.
10. The Compliance Officer of the Company shall review the investor complaint register on a regular basis to find out the status of the complaints whether the same has been resolved within time or not.

G. DISCLOSURE OF STATUS OF INVESTOR COMPLAINTS:

The Compliance Officer shall displayed on the official website of the Company www.erudorecapital.com, the data on complaints received against the Company or against the issues dealt by the Company and redressal thereof, on each of the aforesaid categories separately as well as collectively, latest by 7th of succeeding month, as per the format prescribed by SEBI under the Master Circular dated September 26, 2023, for Merchant Bankers Registered with SEBI.

H. INFORMATION TO SEBI:

The Compliance Officer in consultation with the Board of Directors of the Company, shall be responsible to provide information to SEBI, with respect to the status of investor complaints on half years basis, in compliance with the Master Circular dated September 26, 2023, for Merchant Bankers Registered with SEBI, as a part of other half yearly submissions to be made to SEBI by the Company.

I. AMENDMENT/ MODIFICATION:

This Policy may be amended, modified, varied by the Board of Directors of the Company as may be deemed necessary in the interests or the Company and subject to the provisions of applicable laws, regulations or guidelines.

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