



SOBHAGYA

CAPITAL OPTIONS PVT. LTD.

(Formerly Known as Sobhagya Capital Options Ltd.)

A SEBI Registered Merchant Banking Company

CORPORATE OFFICE

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INVESTOR GRIEVANCE REDRESSAL POLICY

Sobhagya Capital Options Private Limited (SCOPL)

Version: 1.0

Effective Date: 17.07.2026

Approved By: Board of Directors

Review Frequency: Annually or as required by applicable laws and regulations.

1. Objective

Sobhagya Capital Options Private Limited ("SCOPL" or "the Company"), a SEBI registered Category I Merchant Banker, is committed to maintaining high standards of investor protection, transparency, fairness, and ethical business conduct.

The objective of this Investor Grievance Redressal Policy ("Policy") is to:

- establish a transparent and efficient mechanism for handling investor complaints and grievances;
- ensure prompt acknowledgement, investigation, and resolution of investor grievances;
- comply with applicable provisions of the Securities and Exchange Board of India Act, 1992, the SEBI (Merchant Bankers) Regulations, 1992, SEBI circulars, and other applicable laws;
- strengthen investor confidence through fair and timely grievance redressal.

2. Applicability

This Policy shall apply to all investor grievances received by SCOPL in relation to services rendered by the Company as a SEBI registered Category I Merchant Banker.

The Policy shall be applicable to:

- Investors;
- Issuers;
- Clients;
- Applicants in public issues managed by the Company;
- Any other stakeholder interacting with the Company in connection with merchant banking activities.

3. Regulatory Framework

This Policy is framed in accordance with:

- Securities and Exchange Board of India Act, 1992;
- SEBI (Merchant Bankers) Regulations, 1992;



- Applicable SEBI circulars and directions issued from time to time;
 - SEBI's online grievance redressal mechanisms including SCORES, wherever applicable;
 - Any other applicable law, regulation or regulatory guideline.
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4. Guiding Principles

SCOPL shall adhere to the following principles while addressing investor grievances:

- Fairness and impartiality;
 - Prompt acknowledgement;
 - Timely investigation;
 - Transparent communication;
 - Confidentiality of investor information;
 - Compliance with applicable regulatory timelines;
 - Continuous improvement of internal processes.
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5. Types of Investor Grievances

Illustrative grievances may include:

- Delay in responding to investor queries;
 - Non-receipt of issue-related information;
 - Complaints relating to merchant banking services;
 - Alleged deficiencies in service;
 - Incorrect or incomplete disclosures;
 - Regulatory compliance related complaints;
 - Any other complaint relating to services provided by SCOPL.
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6. Modes of Lodging Complaints

Investor grievances may be submitted through:

- Email;
- Written communication addressed to the Registered Office;
- SEBI SCORES platform;
- Any other mode prescribed by SEBI.

The Company shall publish the contact details of the Compliance Officer on its website and other communication channels as required under applicable regulations.



7. Compliance Officer

The Compliance Officer designated under applicable SEBI regulations shall be responsible for:

- receiving investor complaints;
- maintaining records of grievances;
- coordinating investigation with relevant departments;
- ensuring timely resolution;
- responding to SEBI and other regulatory authorities;
- placing periodic grievance reports before the Board of Directors.

In the absence of the Compliance Officer, the Managing Director or any person authorised by the Board shall discharge these responsibilities.

8. Grievance Redressal Process

Step 1 – Receipt

Every complaint received through any channel shall be recorded in the Investor Grievance Register.

Step 2 – Acknowledgement

The Company shall acknowledge receipt of the complaint at the earliest and, where feasible, within two working days.

Step 3 – Investigation

The Compliance Officer shall:

- examine the complaint;
- obtain necessary records;
- seek clarification from concerned officials;
- determine the factual position.

Additional information may be sought from the complainant where necessary.

Step 4 – Resolution

The Company shall endeavour to resolve investor grievances as expeditiously as possible and within the timelines prescribed by SEBI or other applicable regulations.

Where resolution requires the involvement of third parties, the investor shall be informed accordingly.

Step 5 – Closure

A grievance shall be treated as closed when:



- the complaint has been resolved to the satisfaction of the investor; or
 - an appropriate response has been provided along with supporting reasons; or
 - the matter has been disposed of by SEBI or any competent authority.
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9. Escalation Mechanism

If the investor is dissatisfied with the response, the matter may be escalated to:

- Compliance Officer;
- Managing Director;
- Board of Directors, where appropriate.

Investors shall also have the right to approach SEBI through the SCORES platform or any other forum available under applicable law.

10. Investor Grievance Register

The Company shall maintain a register containing, inter alia:

- Complaint Number;
- Date of receipt;
- Name of investor;
- Contact details;
- Nature of grievance;
- Department concerned;
- Action taken;
- Date of resolution;
- Status of complaint;
- Date of closure.

The register may be maintained electronically.

11. Reporting to the Board

The Compliance Officer shall place before the Board, at least on a quarterly basis or such frequency as considered appropriate, a summary containing:

- Number of complaints received;
- Nature of complaints;
- Complaints resolved;
- Pending complaints;
- Reasons for pendency, if any;



- Corrective actions initiated.

The Board shall review significant grievances and ensure adequate systems are in place for effective investor protection.

12. Record Retention

All complaint records, correspondence, supporting documents, investigation reports, and closure communications shall be preserved for the period prescribed under applicable SEBI regulations and other applicable laws.

13. Confidentiality

The Company shall maintain confidentiality of investor information and use such information only for legitimate business, regulatory, or legal purposes.

Information shall be shared only with authorised personnel, regulators, statutory authorities, or where required by law.

14. Continuous Improvement

The Compliance Officer shall periodically analyse investor complaints to identify:

- recurring issues;
- operational weaknesses;
- compliance gaps;
- process improvements.

Appropriate preventive and corrective measures shall be recommended to the management.

15. Review of Policy

This Policy shall be reviewed annually or earlier if required due to:

- amendments in applicable laws;
- SEBI regulations or circulars;
- changes in business operations;
- directions of the Board of Directors.

Any material amendments shall be approved by the Board of Directors.

16. Interpretation

Any question relating to interpretation of this Policy shall be referred to the Board of Directors, whose decision shall be final, subject to applicable laws and regulations.



In the event of any inconsistency between this Policy and any applicable law or SEBI regulation, the applicable law or regulation shall prevail.

17. Contact Details

Compliance Officer

Name: Shweta Jain

Designation: Compliance Officer

Sobhagya Capital Options Private Limited

Registered Office: E-227, Basement, East of Kailash, New Delhi- 110065

Email: delhi@sobhagyacap.com

Telephone: 7836066001

Approval

This Investor Grievance Redressal Policy was approved by the Board of Directors of Sobhagya Capital Options Private Limited at its meeting held on **17th day of July 2026** and shall come into effect from **17.07.2026**.

