

## Clients/ Investors Grievance Redressal Mechanism

- Waterfield Financial and Investment Advisor Pvt Ltd. (hereinafter referred to as “WFIA” or “the Company”) is a SEBI registered Portfolio Manager having SEBI Reg. No. INP000007818 and a SEBI registered Investment Advisor (“IA”) having SEBI Reg. No. INA000001811.
- The objective of this policy is to ensure that:
  - a) Issues raised by investors are dealt with courtesy and are resolved on time.
  - b) The Company will treat all the complaints efficiently and fairly without any bias.
- Grievance Redressal follows the following principles:
  1. Clients are always treated fairly.
  2. Complaints raised by Clients are dealt with courtesy and in a timely manner.
  3. Complaints are treated efficiently and fairly.
  4. The Portfolio Manager’s employees work in good faith and without prejudice, towards the interests of the Investors.
- A designated e-mail id [investor.grievance@waterfieldadvisors.com](mailto:investor.grievance@waterfieldadvisors.com) has been created for the clients to lodge their complaints. This email id is communicated to the clients on the website of the Company <https://waterfieldadvisors.com/regulatory-information> (‘Website’). Further, the website also provides a link to the SCORES 2.0 portal for registering complaints.
- All the client grievances received at [investor.grievance@waterfieldadvisors.com](mailto:investor.grievance@waterfieldadvisors.com) or SCORES Portal or through ODR Portal shall be verified and scrutinized by the Company and the same shall be resolved within 21 calendar days of the receipt of the complaint by means of submission of Action Taken Report (‘ATR’).
- The Company shall also keep Securities and Exchange Board of India (‘SEBI’) informed about the number, nature and other particulars of the complaints received in the manner prescribed by SEBI from time to time.
- If the client is not satisfied with the resolution provided, the client may request for first review and subsequent review of the resolution provided by us within 15 calendar days from the date of submission of ATR and the process as prescribed in SEBI circular no. SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023 shall be followed by us to redress such complaint and thereafter the complaint shall be escalated to the Designated Body authorised by SEBI. SEBI has appointed Association of Portfolio manager in India (APMI) and BSE Limited as Designated body for Portfolio Manager & Investment Adviser respectively.
- If Complainant is not satisfied with the 1st review then the Complainant can opt for 2nd review within 15 days. Thereafter, the complaint shall be escalated to supervising official of the dealing officer of the Designated Body and he shall seek clarifications from the company or the client for the same.
- Alternatively if the client is not satisfied, he/ she can also access a common Online Dispute Resolution Portal (‘ODR Portal’) at <https://smartodr.in/> under Investor Login to lodge a complaint

which harnesses conciliation and online arbitration for resolution of disputes arising in the Indian Securities Market has been established. The link is also provided on the website of the company.

- The new framework provides for two types of ODR: Online conciliation and online arbitration. Online conciliation is a process in which a neutral third party, known as a conciliator, helps disputing parties to reach a mutually agreeable settlement. Online arbitration is a process in which a neutral third party, known as an arbitrator, makes a binding decision on the dispute.
- Application of ODR: All disputes arising out of the securities market, including disputes between investors and intermediaries, disputes between intermediaries, and disputes between investors and listed companies.
- Limitations of ODR:
  - 1) The parties must initiate ODR proceedings within 6 months of the date on which the dispute arose.
  - 2) Both parties to a dispute must agree to participate in ODR before it can be used.
- All the client grievances would be updated in an excel register in the format specified in **Annexure 1** on the same day of the receipt of the complaint. This register would be monitored by the Compliance department.



Annexure 1\_Investor  
Grievance Register.xls

- On a monthly basis, the Company displays the status of the complaint received on its website. The link to access the same is <https://waterfieldadvisors.com/regulatory-information>
- The Investor Charters for Investment Advisers and Portfolio Management Services is uploaded on the website of the Company. The link to access the same is <https://waterfieldadvisors.com/regulatory-information>.
- The Company shall reserve the rights to review and make amendment to the Policy from time to time as it deems fit in accordance with the applicable laws, rules and regulations for the time being in force. In the event of any conflict between the provisions of this Policy and the Act or Regulations or Rules or any other statutory enactments, the provisions of such Act or Regulations or Rules or statutory enactments shall prevail over this Policy. An interim review and amendment can also be carried out to accommodate minor changes, if any, in regulatory and operating front by the Compliance Officer of the Company.
- **Investor grievance mechanism for Persons with Disabilities:**
  1. The Company has a dedicated Accessibility Feedback webform, available on both the website and mobile application, to report accessibility-related issues or seek assistance.
  2. Upon submission of any accessibility-related grievance, the investor will receive an automated acknowledgment email containing a copy of their submission and the expected timeline for resolution which is 21 calendar days of the receipt of the complaint.

3. An Action Taken Report ('ATR') will be shared with the client by the Nodal Officer appointed for Digital accessibility by Persons with Disabilities.
4. For escalations or unresolved matters, clients may contact our designated escalation officer or file a complaint under the "Accessibility" category on SEBI's SCORES platform at <https://scores.sebi.gov.in>.
5. In the event that an accessibility-related complaint is received through SEBI's SCORES platform, the same grievance redressal process as specified on page one of this policy shall be followed to ensure timely and effective resolution of the complaint.
6. All communications with PwD investors will be handled with sensitivity and priority, ensuring that our compliance and senior management remain informed and involved in the resolution process to guarantee timely and effective redressal of their concerns.

- We have also devised the below escalation matrix to facilitate an easy approach for clients before they file any grievance with SEBI. The same is also displayed on our website:

Designation	Contact Person name	Address	Contact No. and Email ID	Working hours when complainant can call
Customer care	Roohie Shekasan – Director – Client Services	142, 14th Floor, Maker Chambers VI, Nariman Point, Mumbai - 400021	+91 22 6621 0700 <a href="mailto:customer.care@waterfielddadvisors.com">customer.care@waterfielddadvisors.com</a>	10:00 am to 6:00 pm
Head of Customer Care	Roohie Shekasan – Director – Client Services	142, 14th Floor, Maker Chambers VI, Nariman Point, Mumbai - 400021	+91 22 6621 0700 <a href="mailto:customer.care@waterfielddadvisors.com">customer.care@waterfielddadvisors.com</a>	10:00 am to 6:00 pm
Compliance Officer	Shilpa Dadhich - Director – Legal, Compliance and Secretarial and Group Company Secretary.	7, Avighna House, 82, Dr. Annie Besant Road, Worli Naka, Siddharth Nagar, Worli, Mumbai, Maharashtra 400018	+91-22-66210706 <a href="mailto:investor.grievance@waterfielddadvisors.com">investor.grievance@waterfielddadvisors.com</a>	10:00 am to 6:00 pm
CEO/ Director	Soumya Rajan	7, Avighna House, 82, Dr. Annie Besant Road, Worli Naka, Siddharth Nagar, Worli, Mumbai, Maharashtra 400018	+91-22-66210700 <a href="mailto:ceoffice@waterfielddadvisors.com">ceoffice@waterfielddadvisors.com</a>	10:00 am to 6:00 pm
Principal Officer	<b>INVESTMENT ADVISORY</b>  Mr. Vivek Rajaraman –	7, Avighna House, 82, Dr. Annie Besant Road, Worli Naka, Siddharth Nagar, Worli, Mumbai, Maharashtra 400018	+91-22-66210700 <a href="mailto:principal.officer@waterfielddadvisors.com">principal.officer@waterfielddadvisors.com</a>	10:00 am to 6:00 pm

	<b>PORTFOLIO MANAGEMENT SERVICES</b>  Mr. Arun Prakash Sampath Kumar	7, Avighna House, 82, Dr. Annie Besant Road, Worli Naka, Siddharth Nagar, Worli, Mumbai, Maharashtra 400018	<a href="tel:+91-22-66210700">+91-22-66210700</a> <a href="mailto:principal.officer@waterfielddadvisors.com">principal.officer@waterfielddadvisors.com</a>	10:00 am to 6:00 pm
Nodal Officer	Himanshu Maheshwari – Head of Operations and Technology	142, 14th Floor, Maker Chambers VI, Nariman Point, Mumbai - 400021	<a href="tel:+91-22-6621-0700">+91 22 6621 0700</a> <a href="mailto:himanshu.m@waterfielddadvisors.com">himanshu.m@waterfielddadvisors.com</a>	10:00 am to 6:00 pm