

Grievance Redressal & Dispute Settlement Mechanism

In case of disputes, claims and questions whatsoever arising from (i) the Agreement between the Client and Wave Asset Private Limited (the “**Portfolio Manager**”) and (ii) the services to be rendered by the Portfolio Manager, the Client shall have the following remedies available to him:

1. The clients are requested to send their grievances to the Principal Officer at grievance@waveasset.in or call on +91 - 8591599274.
2. The aforesaid personnel of the Entity will attend to and address any client query/concern/grievance at the earliest. The aforesaid official will immediately identify the grievance and take appropriate steps to eliminate the causes of such grievances to the satisfaction of the Client.

Effective grievance management would be an essential element of the Portfolio Manager's portfolio management services and the aforesaid official may adopt the following approach to manage grievance effectively and expeditiously:

1. **Quick action-** As soon as any grievance comes to the knowledge of the aforesaid personnel, it would be identified and resolved. This will lower the detrimental effects of the grievance.
2. **Acknowledging grievance-** The aforesaid officer shall acknowledge the grievance put forward by the Client and look into the complaint impartially and without any bias.
3. **Gathering facts-** The aforesaid official shall gather appropriate and sufficient facts explaining the grievance's nature. A record of such facts shall be maintained so that these can be used in later stage of grievance redressal.
4. **Examining the causes of grievance-** The actual cause of grievance would be identified. Accordingly, remedial actions would be taken to prevent repetition of the grievance.
5. **Decision making** - After identifying the causes of grievance, alternative course of actions would be thought of to manage the grievance. The effect of each course of action on the existing and future management policies and procedure would be analysed and accordingly decision should be taken by the aforesaid official. The aforesaid official would execute the decision quickly.
6. **Review** - After implementing the decision, a follow-up would be there to ensure that the grievance has been resolved completely and adequately.

Grievances/concerns, if any, which may not be resolved/satisfactorily addressed in aforesaid manner shall be redressed through the administrative mechanism by the designated Compliance Officer and subject to the SEBI PMS Regulations. The Compliance Officer will endeavor to address such grievance in a reasonable manner and time. The coordinates of the Compliance Officer are provided as under:

Name	Karan Gupta
Designation	Compliance Officer
Address	Office 02B121, 1st Floor, Vaswani Chambers, 264-265, Dr Annie Besant Rd, Worli, Mumbai – 400030
Telephone No	+91- 8591599274

Wave Asset Private Limited

Registered Office: 902 RNA Mirage, S K Ahire Marg, Worli, Mumbai - 400030

T: +91 – 8591599274 | E: contact@waveasset.in

CIN No.: U66309MH2012PTC229481 | SEBI Reg. No.: INP000008428

Email id	compliance@waveasset.in
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If the Client remains dissatisfied with the remedies offered or the stand taken by the Compliance Officer, the Client and the Portfolio Manager shall abide by the following mechanisms:

- A) **SEBI Complaints Redress System (SCORES):** SEBI has set up an online complaints redressal system (SCORES- <https://scores.gov.in/scores/Welcome.html>) for easy retrieval and tracking of complaints.
- The entity will receive the complaints through SCORES and such complaints shall be resolved on a best effort basis within a period of 21 calendar days from the receipt of such complaint. Such a complaint will also be forwarded simultaneously to Association of Portfolio Managers of India (APMI) and APMI shall ensure that an Action Taken Report (ATR) is submitted within 21 days.
 - If the complainant is not satisfied with the action taken by the entity, he shall request the review of the complaint within 15 calendar days of ATR. APMI shall then take cognizance of such a complaint and it may seek clarification on the ATR submitted by the entity. The entity shall then provide required clarification on the ATR and APMI shall then forward a revised ATR within 10 calendar days to the complainant through SCORES.
 - The complainant may seek second review of the ATR provided by APMI within 15 calendar days from the date of submission of ATR by APMI. If the complainant is satisfied with the action taken by APMI, the complaint shall be disposed of on SCORES.
 - In case the complainant is not satisfied with the ATR provided by APMI, Securities and Exchange Board of India (SEBI) shall take cognizance of second review of the complaint through SCORES.
 - SEBI may take up review with the stakeholders, with APMI and / or with the entity. APMI or the entity should then take immediate action on receipt of a second review of the complaint and a revised ATR shall be submitted to SEBI within the timeline specified by SEBI.
 - SEBI or APMI can then seek clarification on the ATR submitted by the entity for SEBI review complaint. The entity should provide required clarification wherever sought and within such a timeline as specified.
 - The second review complaint shall be treated as 'resolved' 'disposed' or 'closed' only when SEBI disposes or closes the complaint in SCORES. Hence, mere filing of ATR with respect to SEBI review complaint will not mean that SEBI review complaint is disposed of.

- B) **Online Dispute Resolution (ODR):** Clients can also submit their complaints on The Securities Market Approach for resolution through ODR portal for online arbitration and conciliation of complaints. The portal can be accessed at <https://smartodr.in/login>

C) Arbitration and Conciliation:

Any dispute unresolved by the above internal grievance redressal mechanism of the Portfolio Manager, can be submitted to arbitration under the Arbitration and Conciliation Act, 1996. The arbitration shall be before three arbitrators, with each party entitled to appoint an arbitrator and the third arbitrator being the presiding arbitrator appointed by the two arbitrators. Each party will bear the expenses / costs incurred by it in appointing the arbitrator and for the arbitration proceedings. Further, the cost of appointing the presiding arbitrator will be borne equally by both the parties. Such arbitration proceedings shall be held at Mumbai and the language of the arbitration shall be English. The courts of Mumbai shall have the exclusive jurisdiction to adjudicate upon the claims of the parties.

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