



LAUNCHPAD FINTECH PRIVATE
LIMITED

GRIVIENCE REDRESSAL POLICY

**(Approved by the Board of Directors in the Board meeting held on
December 30, 2020, amended in the Board meeting held on March 17, 2023
and further amended in the Board meeting held on April 05, 2024)**

INTRODUCTION:

It is essential that grievances of the clients are given due importance and quick action is taken to resolve the same. To provide efficient and enhanced services to the clients, Launchpad Fintech Private Limited ('the Company') has a mechanism in place to address the grievances of its clients relating to any business or service related issues made directly or through the Regulatory authorities/ other authorities through arbitration etc. Launchpad Fintech Private Limited provides Online Bond Platform for its clients and vide its platform www.bondsindia.com wherein clients can register their KYC on the platform and can purchase and sale bonds vide the platform www.bondsindia.com.

The Company's Grievance Redressal policy follows the following principles:

1. Complaints are dealt with courtesy and in a timely manner.
2. Queries and Complaints are treated efficiently and fairly.
3. The employees in Launchpad Fintech Private Limited work in good faith and without prejudice, towards the interests of the clients.
4. Clients are informed of avenues to raise their queries and complaints within the organization, and their rights if they are not satisfied with the resolution of their complaints.

All the Investor complaints are handled at the Registered Office of the Company. The Compliance Officer is in charge of handling all complaints received. Compliance officer shall act as a Designated Person for redressal of grievances. The Company has a designated grievance redressal email id: compliance@bondsindia.com, igr@bondsindia.com on which the client or investor can make a complaint. The details of the mail id are available in our website. Email complaints is verified and attended on daily basis by the Compliance Officer.

As a first contact point for redressal of the client's complaints, the client can approach the Compliance Officer of the Company whose name and contact details are provided through display boards and all correspondences. The Compliance Officer shall review the investor complaint register on weekly basis to find out whether complaint has been resolved within time or not.

All claims, differences and disputes arising under or in connection with or in relation hereto the Website, the Terms of Use or any transactions entered into on or through the Website or the relationship between clients and LFPL shall be subject to the award of the sole arbitrator to be appointed by the Arbitration Centre in accordance with its rules and subject to the provisions of the Arbitration and Conciliation Act, 1996 as amended from time to time. The venue of such Arbitration shall be city of Mumbai, India and language of Arbitration shall be English.

Further, pursuant to OBPP circular issued by SEBI vide circular number SEBI/HO/DDHS/DDHS-RACPOD1/P/CIR/2022/154 dated 14th November, 2022, investors can lodge complaint vide SCORES mechanism provided by SEBI.

GRIEVANCE REDRESSAL MECHANISM:

1. Emails received from the clients should be properly classified into complaints and routine queries.
2. All the complaints received directly from the client should be updated in the Complaint register and immediately shall be forwarded to Compliance officer, for resolution. Register of complaints is centrally maintained by Compliance Officer.
3. If complaints are received from client in form of e-mails or physical letters or telephone calls then the same shall be forwarded to Departmental Head/Manager for redressal and He / She has to reply to Compliance Officer along with his / her inputs within two working days.
4. Compliance Officer shall study the nature of the complaint and scrutinize / investigate it in detail.
5. Scrutiny / Investigation may involve verifying case facts with client's KYC,, DP statement of Launchpad Fintech Private Limited etc. as the case may be.

6. Investigation / scrutiny, being a vital step in the process of resolution, audit trail should be maintained for future reference. Details of the same should be recorded in the complaint register along with date.
7. However, where it is felt that complaint is not tenable, the client shall be accordingly provided with clarification for the same.
8. After detailed scrutiny / investigation of the complaint as above, Compliance Officer shall draft reply and sent it to the client / Exchange / SEBI as the case may be.
9. Compliance Officer shall ensure that there is no complaint pending to be resolved for more than 15 days from their end.
10. Compliance Officer shall periodically report Designated Directors about status of pending grievances.

RESOLUTION MECHANISM FOR ONLINE COMPLAINTS THROUGH SCORES:

In case Investor has approached the Company for redressal of the Complaint and the Company has rejected the Complaint or the Complainant has not received any communication from the concerned Company or is not satisfied with the reply received or the redressal by the Company may submit an online complaint / grievance through SCORES 2.0 at <https://scores.sebi.gov.in/> within one year from date of cause of action.

Complaint shall be auto forwarded to the Company through SCORES 2.0. The Company shall resolve the Complaint and upload the ATR on SCORES 2.0 within 21 calendar days of receipt of the Complaint. The ATR uploaded by the Company will be automatically routed to the complainant.

The given complaint shall be simultaneously forwarded to Designated Body, i.e., relevant Stock Exchange (“Stock Exchange”) selected at the time of submission of Complaint on the Scores 2.0. The Designated Body to ensure that the Company shall submit the ATRs with the

stipulated

timeline.

First review

In case the Company has not submitted the ATR within the stipulated time of 21 calendar days, the concerned Designated Body shall take cognizance of the Complaint for first review of the resolution through SCORES.

Or

If the complainant is not satisfied with the resolution provided and makes a request for a review of the resolution provided by the Company within 15 calendar days from the date of submission of ATR. The concerned Entity shall submit the ATR to the Designated Body within the time stipulated by the Designated Body.

Second review

The complainant may seek a second review of the Complaint within 15 calendar days from the date of the submission of the ATR by the Designated Body.

In case the Designated Body has not submitted the ATR within the stipulated time of 10 calendar days or If the complainant is not satisfied with the ATR provided by the Designated Body, SEBI may take cognizance of the Complaint for second review through SCORES.

Then, SEBI may take up the review with stakeholders involved, including the Company or/and Designated Body. The Company or/and Designated Body shall take immediate action on receipt of second review complaint from SEBI and submit revised ATR to SEBI through SCORES 2.0, within the timeline specified by SEBI. The second review Complaint shall be treated as 'resolved' or '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 the SEBI review complaint is disposed.

Initiation of the Dispute Resolution Mechanism

After exhausting the aforementioned options for resolution of grievance, if the investor is still not satisfied with the outcome or where the issues raised require adjudication on any third party rights, on questions of law or fact or which is in the nature of a list between parties or if investors are not satisfied with disposal on SCORES post SEBI review, they shall seek appropriate remedies through the Online Dispute Resolution mechanism in securities market. In addition, investors have the option to approach legal forums including civil courts, consumer courts etc.

In case the Investor opts for Online Dispute Resolution mechanism or other appropriate civil remedies at any point of time while the complaint is pending on SCORES 2.0, the pending complaint shall be treated as disposed on SCORES 2.0.

Important Links-

SEBI SCORES 2.0- <https://scores.sebi.gov.in/scores-home>

SMART ODR- <https://smartodr.in/login>

PROCESS FLOW FOR COMPLAINT RESOLUTION

