



GLOBE CAPITAL (IFSC) Limited

Complaints Handling and Grievance Redressal Policy April 2025

Version	Effective Date	Summary of Changes	Approver
V 1.0	April 01, 2025	New Policy	Board of Directors

Globe Capital (IFSC) Limited

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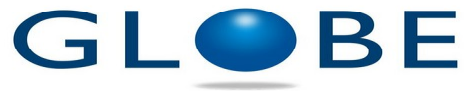
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Complaints Handling and Grievance Redressal Policy

1. Overview:

Globe Capital (IFSC) Limited ("Globe IFSC") is registered with International Financial Services Centers Authority ('IFSCA') as Trading cum Clearing Member.

The IFSCA has issued the Circular titled "Complaint Handling and Grievance Redressal by Regulated Entities in the IFSC" dated December 02, 2024 and January 13, 2025, which provides for regulatory framework for handling of complaints and redress of grievances by the regulated entities in the International Financial Services Centre (IFSC), which inter alia provides detailed norms and requirements pertaining to policy for complaint handling and grievance redressal, procedure for complaint handling along with timelines, appeal mechanism, maintenance of records, disclosures on website and annual report, reporting and maintenance of online system for complaint handling.

In line with the aforesaid requirement, the Board of Directors have approved this policy on Complaint Handling and Grievance Redressal policy for investor complaints.

2. Definition:

- a) "Complaint Redressal Appellate Officer" or "CRAO" shall be officer as defined in IFSCA Circular No. F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 02, 2024.

- b) "Complaint Redressal Officer" or "CRO" shall be the officer as defined in IFSCA Circular No. F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 02, 2024.
- c) "Consumer" shall have the same meaning as assigned to "Client" or "Customer" under clause 1.3.11 of the IFSCA (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines, 2022, as amended from time to time;
- d) "Group Entity" means an entity of a business group that consists of a parent company or of any other type of legal person exercising control over the rest of the group, together with branches and/or subsidiaries;
- e) "Non-retail" consumer means a person that is considered as a "non-retail" under the regulatory framework specified by the Authority:

Explanation I: Where the differentiation between "retail" vs. "non-retail" has not been specified in the regulations issued by the Authority for any specific business activity, the non-individual consumers shall be considered as "non-retail" consumers for the purpose of this circular.

Explanation II: All the investors participating in a scheme launched by a registered FME (Non- retail) or Authorised FME shall qualify as "non-retail" consumers;

- f) "Professional Consumer" shall mean an accredited investor as covered under the circular titled 'Accredited Investors in IFSC' dated January 25, 2024, as amended; a professional client as covered under the IFSCA Banking Handbook, as amended; or a corporate policy holder;
- g) "Retail Consumer" for the purpose of this circular shall mean a consumer of a Regulated Entity other than Professional Consumer and non-retail consumer.

3. Complaints Handling Procedure:

- a. Any Consumer who wish to file any complaint or grievance with GLOBE IFSC can send an email to ifscigr@globecapitalifsc.com or letter to the registered office of GLOBE IFSC.
- b. The email/letter should clearly mention the full facts of the complaint or grievance for GLOBE IFSC to check, investigate and respond to the complainant.
- c. On receipt of a complaint, CRO shall assess the merits of the complaint. Pursuant to assessment,
 - i. In case of acceptance, GLOBE IFSC shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
 - ii. In case of non-acceptance, GLOBE IFSC shall inform the complainant within 5



working days along with reasons.

- d. GLOBE IFSC shall examine and process the complaint in a fair, transparent, professional and impartial manner.
- e. Where the CRO is or was involved in the conduct of the financial transaction which is the subject matter of the complaint, the complaint shall be handled by another officer designated by the CRAO, in a fair and impartial manner.
- f. GLOBE IFSC may seek such additional information from the complainant, as maybe necessary to review and processing the complaint.
- g. Upon receipt of such additional information in a timely manner, GLOBE IFSC shall dispose of the complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint.
- h. Resolution of the complaint or rejection with reason for rejection would be communicated to the complainant in writing by email / letter.

4. Indicative list of what will be treated as a complaint:

- Non-Issuance of the Documents by the Trading Member
- Non-receipt of funds / securities
- Non-receipt of margin/security deposit given to the Trading Member (TM)
- Non-Receipt of Corporate Benefit (dividend / interest / bonus etc.)
- Auction value / close out value received or paid
- Execution of Trades without Consent
- Excess Brokerage charged by Trading Member / Sub-broker
- Non-receipt of credit balance as per the statement of account
- Non-Receipt of Funds / Securities kept as margin
- Excess Brokerage Charged

5. Indicative list of what is not treated as a complaint:

- a. Anonymous complaints (except whistleblower complaints),
- b. Incomplete or unspecific complaints,
- c. Allegations without supporting documents
- d. Suggestions or seeking guidance/explanation
- e. Complaints on matters not relating to the financial products or services provided by GLOBE IFSC
- f. Complaints about any unregistered/ unregulated activity
- g. References in the nature of seeking information or clarifications about financial

products or service

- h. Any other matters as may be decided by the Board of Directors of GLOBE IFSC depending on the facts and circumstances of the case from time to time.

6. Appeal Mechanism (with GLOBE IFSC):

- a. If a complainant is not satisfied with the resolution provided or if the complaint has been rejected, the complainant may file an appeal before the CRAO of the GLOBE IFSC preferably within 21 days of the receipt of the decision from the CRO.
- b. The CRAO shall dispose of the Appeal within a period of 30 days.

7. Complaint/Appeal before MII:

Where a complainant is not satisfied with the decision of regulated entity and exhausted appellate mechanism of GLOBE IFSC, he may file a complaint with relevant MII as per the mechanism provided by them preferably within 21 days from the receipt of the decision from GLOBE IFSC.

8. Complaint/Appeal before the Authority ("IFSCA"):

Where a complainant is still not satisfied with the decision of the relevant market infrastructure institution, the complainant may file a complaint before the Authority through email to grievance-redressal@ifsc.gov.in preferably within 21 days from the receipt of the decision.

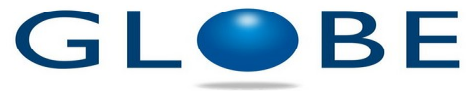
9. Maintenance of Records:

GLOBE IFSC shall maintain all records relating to the handling of complaints, including the following:

- i. Complaints received and processed,
- ii. All correspondences exchanged between GLOBE IFSC and the complainants,
- iii. All information and documents examined and relied upon by GLOBE IFSC while processing the complaints,
- iv. Outcome of the complaints,
- v. Reasons for rejection of complaints, if any,
- vi. Timelines for processing of complaints, and
- vii. Data of all complaints handled by GLOBE IFSC.

GLOBE IFSC shall maintain records in electronic retrieval form for the same period as mandated by the Authority under the relevant and applicable regulations and circulars, handbooks, guidelines thereunder.

Provided that in case there is no specific mention of such time period, the record shall be maintained for at least six years from the date of disposal of complaint:



Provided further that in case of any pending litigation or legal proceeding relating to the complaint, the record shall be maintained for the applicable period, after final disposal of the proceeding.

10. Review

The policy shall be reviewed by Board of Directors on periodic basis and necessary changes, regulatory or otherwise, shall be carried out and updated in the said policy and shall be recommended to Board to Directors for their approval.
