GOODFLOW SECURITIES PRIVATE LIMITED

INVESTOR GRIEVANCE REDRESSAL POLICY

SEBI Registration No.: INZ000303634

NSE Membership No.: 90255 | BSE Membership No.: 6830 | MCX Membership No.: 57425

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1. INTRODUCTION

Goodflow Securities Private Limited ("Goodflow" / "the Company") is committed to providing efficient, transparent and fair services to its clients and investors.

Goodflow has established an Investor Grievance Redressal Mechanism to receive, examine and resolve complaints and grievances relating to the services provided by the Company in accordance with the applicable provisions of the Securities and Exchange Board of India ("SEBI") and the rules, regulations, circulars and guidelines issued by the recognised Stock Exchanges from time to time.

The Company endeavours to ensure that investor grievances are handled in a fair, transparent, prompt and time-bound manner.

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2. OBJECTIVE

The objectives of this Policy are to:

1. Provide investors with a simple and accessible mechanism for lodging grievances;
2. Ensure that grievances are acknowledged, investigated and resolved in a timely manner;
3. Maintain transparency in the grievance redressal process;
4. Provide appropriate escalation mechanisms where the investor is not satisfied with the resolution;
5. Identify recurring issues and take appropriate corrective and preventive measures; and
6. Comply with the applicable regulatory requirements of SEBI and the recognised Stock Exchanges.

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3. SCOPE

This Policy applies to complaints and grievances relating to the services provided by Goodflow Securities Private Limited in its capacity as a SEBI-registered Stock Broker and Trading Member of the recognised Stock Exchanges.

The Company presently has the following memberships:

Particulars	Details
SEBI Registration No.	INZ000303634
NSE Membership No.	90255
BSE Membership No.	6830
MCX Membership No.	57425

The Company is not a Depository Participant with CDSL or NSDL and does not presently offer Margin Trading Facility ("MTF") or Portfolio Management Services ("PMS"). Accordingly, matters specifically relating to such services are outside the scope of this Policy.

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4. DESIGNATED INVESTOR GRIEVANCE CONTACT

Investors/clients may lodge their complaints or grievances directly with Goodflow through the following designated channel:

Investor Grievance Email ID: grievance@goodflowsecurities.com

Registered Office

Goodflow Securities Private Limited

6th Floor, Office 612/613, Hive 67, ICON, Poisor Gymkhana Road, Lokmanya Tilak Nagar, Poisor, Near Raghuleela Mall, Kandivali West, Mumbai – 400067.

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5. PROCEDURE FOR LODGING A GRIEVANCE

An investor/client having any complaint or grievance relating to the services provided by Goodflow may first approach the Company through the designated Investor Grievance Email ID:

grievance@goodflowsecurities.com

The complaint should, wherever applicable, contain sufficient details to enable the Company to investigate and resolve the matter, including:

- Name of the client/investor;
- Client Code / relevant account details;
- Nature of the complaint;
- Relevant transaction details;
- Date of occurrence of the issue;
- Supporting documents, if any; and
- Contact details for communication.

The Company may seek additional information or documents from the investor where necessary for examining the grievance.

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6. ACKNOWLEDGEMENT AND REDRESSAL OF GRIEVANCES

Goodflow shall examine each complaint received through the designated grievance channel and shall endeavour to resolve the grievance promptly.

The Company shall strive to redress the grievance immediately and **not later than 21 days from the date of receipt of the grievance**, in accordance with the applicable regulatory framework.

Where additional information or documents are required from the investor, the Company may seek such information for proper examination of the grievance.

The Company shall communicate its response/resolution to the investor through an appropriate mode of communication.

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7. INTERNAL GRIEVANCE REDRESSAL PROCESS

Upon receipt of a grievance:

Step 1 – Receipt of Grievance

The grievance is received through the designated Investor Grievance Email ID or other permitted channels.

Step 2 – Registration

The grievance is recorded in the Company’s grievance/complaint records with the relevant particulars.

Step 3 – Examination

The complaint is examined by the Compliance Officer / concerned department and relevant records, transactions and documents are reviewed.

Step 4 – Additional Information

Where required, additional information or supporting documents may be obtained from the investor or the concerned department.

Step 5 – Resolution

The Company shall take appropriate corrective action, wherever required, and communicate the resolution/reply to the investor.

Step 6 – Closure / Escalation

The grievance shall be treated as resolved upon communication of the Company's response, subject to applicable regulatory rights of the investor to seek further redressal through the prescribed mechanisms.

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8. ESCALATION MECHANISM

If an investor is not satisfied with the response/resolution provided by Goodflow, the investor may avail the grievance redressal mechanisms available through SEBI and the concerned Stock Exchange, as applicable.

8.1 SCORES 2.0

Investors may lodge a complaint through **SCORES 2.0 – SEBI's Complaints Redress System**.

The SCORES 2.0 mechanism provides for a two-level review process:

1. **First Level Review:** Review by the concerned Designated Body / Stock Exchange; and
2. **Second Level Review:** Review by SEBI.

The investor may use SCORES 2.0 where the grievance remains unresolved or the investor is dissatisfied with the response, subject to the applicable process and timelines.

8.2 Online Dispute Resolution (ODR)

Investors may also avail the **Online Dispute Resolution (ODR)** mechanism through the applicable ODR platform for resolution of eligible disputes through online conciliation and/or arbitration, in accordance with the applicable SEBI framework.

The availability and applicability of ODR shall be subject to the nature of the dispute and the applicable regulatory framework.

8.3 Stock Exchange Mechanism

Investors may also approach the concerned Stock Exchange for grievance redressal in accordance with the applicable rules, regulations and procedures of the respective Exchange.

For complaints relating to transactions/services of Goodflow on a particular Exchange, the investor may approach the relevant Exchange's prescribed investor grievance mechanism.

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9. DOCUMENTS / INFORMATION FOR GRIEVANCE REDRESSAL

Investors are advised to provide relevant supporting documents and information along with their complaint, wherever applicable, such as:

- Client account details;
- Contract notes;
- Ledger statements;
- Transaction details;
- Bank/payment records;
- Correspondence exchanged with the Company;
- Statements or reports relevant to the grievance; and
- Any other document supporting the complaint.

Investors should retain copies of all documents and correspondence submitted to the Company.

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10. CONFIDENTIALITY AND FAIR TREATMENT

Goodflow shall endeavour to handle investor grievances fairly, objectively and confidentially, subject to applicable legal and regulatory requirements.

The Company shall take reasonable steps to ensure that complaints are examined independently and that appropriate corrective action is taken wherever a deficiency in service or other issue is identified.

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11. RECORD KEEPING AND MONITORING

Goodflow shall maintain appropriate records of investor complaints and grievances, including:

- Date of receipt;
- Nature of complaint;
- Client details;
- Action taken;
- Response communicated;
- Date of resolution/closure; and
- Such other particulars as may be required under applicable regulatory requirements.

The Company shall periodically review the nature and causes of grievances to identify recurring issues and implement appropriate corrective or preventive measures.

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12. DISCLOSURE OF INVESTOR COMPLAINTS

Goodflow shall disclose the applicable investor complaint data on its website in the manner and within the timelines prescribed by SEBI and the recognised Stock Exchanges from time to time.

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13. REGULATORY FRAMEWORK

This Policy shall be read together with the applicable provisions of:

- Securities and Exchange Board of India Act, 1992;
- Securities Contracts (Regulation) Act, 1956;
- Applicable SEBI Regulations, circulars, master circulars and guidelines;
- Applicable rules, regulations, circulars and bye-laws of NSE, BSE and MCX;
- SEBI's Investor Charter framework;
- SCORES 2.0 framework;
- Online Dispute Resolution framework; and
- Any other applicable regulatory requirements issued from time to time.

In case of any amendment to the applicable regulatory framework, the Company shall suitably modify this Policy.

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14. REVIEW OF POLICY

This Policy shall be reviewed periodically and whenever there is a material change in the applicable regulatory requirements or the Company's grievance redressal mechanism.

The Company reserves the right to amend this Policy from time to time to ensure continued compliance with applicable laws, regulations, circulars and regulatory requirements.

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15. CONTACT DETAILS

Goodflow Securities Private Limited

Investor Grievance Email: grievance@goodflowsecurities.com

Registered Office:

6th Floor, Office 612/613, Hive 67, ICON,Poisor Gymkhana Road, Lokmanya Tilak Nagar, Poisor, Near Raghuleela Mall, Kandivali West, Mumbai – 400067.

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Disclaimer: This Policy should be read in conjunction with the applicable SEBI, Stock Exchange and other regulatory requirements, as amended from time to time.

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