

REF NO.-

DATE -

PLACE -



GRIEVANCE REDRESSAL POLICY

VICTORIA PARADISE ADVISOR LLP

Victoria Paradise Wealth (VPW)

Document Version: 1.0

Effective Date: [Date]

Last Updated: [Date]

1. PREAMBLE AND OBJECTIVE

Victoria Paradise Advisor LLP ("VPW"), operating as Victoria Paradise Wealth, is committed to providing high-quality financial distribution and advisory services to its clients. We recognize that despite our best efforts, situations may arise where clients have concerns, complaints, or grievances regarding our services. This Grievance Redressal Policy has been formulated to:

- Provide a structured, transparent, and time-bound mechanism for addressing client grievances
- Ensure fair, efficient, and courteous handling of all complaints
- Minimize instances of client dissatisfaction through continuous service improvement
- Comply with SEBI (Mutual Funds) Regulations, 1996, and AMFI Code of Conduct requirements
- Build and maintain trust and confidence among our clients

Guiding Principles

1. Client-First Approach: Every grievance will be treated seriously and with utmost priority
 2. Transparency: Clear communication at every stage of the grievance resolution process
 3. Fairness: Impartial examination and resolution of all complaints
 4. Timeliness: Resolution within prescribed timelines with regular updates
 5. Confidentiality: All grievance details will be kept confidential and secure
 6. Continuous Improvement: Learning from complaints to enhance service delivery
-

2. DEFINITIONS

For the purpose of this policy:

2.1 Grievance/Complaint

Any written or electronic communication expressing dissatisfaction with VPW's services, including but not limited to:

- Service failures or delays
- Incorrect processing or misguidance
- Non-receipt of documents or statements
- Transaction-related issues
- Commission or fee disputes
- Data privacy concerns
- Unprofessional conduct by VPW personnel
- Deviation from agreed service standards

2.2 Query

A request for information, clarification, or assistance that does not express dissatisfaction with services rendered.

2.3 Service Request

A request for routine services such as account statements, portfolio reports, change of contact details, etc., without expressing dissatisfaction.

2.4 Complainant

Any client, investor, or prospective client of VPW who lodges a grievance or complaint.

2.5 Action Taken Report (ATR)

The written response provided by VPW to the complainant detailing the investigation findings and resolution/closure of the complaint.

3. SCOPE AND APPLICABILITY

This policy applies to:

- All clients (existing and prospective) of Victoria Paradise Wealth

- All types of grievances related to mutual fund distribution and incidental advisory services provided by VPW
- All channels of communication through which grievances may be received
- All VPW personnel involved in service delivery and grievance handling

Types of Grievances Covered:

- Transaction-related complaints (purchase, redemption, switch, SIP)
 - Service quality issues
 - Documentation and reporting concerns
 - Commission disclosure complaints
 - Data protection and privacy breaches
 - Advisory-related grievances
 - Staff conduct issues
 - Delay in service delivery
 - Any other matter related to VPW's services
-

4. GRIEVANCE REDRESSAL STRUCTURE

VPW has established a three-tier internal grievance redressal structure to ensure effective resolution:

Tier 1: First Point of Contact - Customer Service Team

Designated Officer: Customer Service Manager

Name: Sujeet Yadav

Email: customercare@onlyvpw.com

Responsibility: Initial receipt, acknowledgment, and resolution of straightforward complaints

Timeline: Resolution within 6 business days from date of receipt

Tier 2: Escalation - Compliance and Grievance Redressal Officer

Designated Officer: Compliance and Grievance Redressal Officer (GRO)

Name: Sujeet Yadav

Email: grievances@onlyvpw.com

Responsibility:

- Review complaints escalated from Tier 1
- Handle complex complaints requiring detailed investigation
- Ensure compliance with regulatory timelines
- Interface with SEBI SCORES platform

Timeline: Resolution within 6 business days from escalation date

Tier 3: Final Internal Authority - Principal Officer / Director

Designated Officer: Principal officer

Name: Kundan karmakar

Email: Ceo@onlyvpw.com

Responsibility:

- Final internal review of unresolved complaints
- Decision-making authority for complex cases
- Overall oversight of grievance redressal function
- Interface with SEBI for regulatory matters

Timeline: Resolution within 6 business days from escalation date

5. CHANNELS FOR LODGING GRIEVANCES

Clients may lodge their grievances through any of the following channels:

5.1 Email

- Primary Grievance Email:
- grievances@vpw.in
- [or appropriate email]
- Customer Service Email:
- customercare@vpw.in
- [or appropriate email]
- Available: 24/7 (acknowledgment during business hours)

5.2 Phone

- Grievance Helpline: [Toll-Free Number]
- Office Landline: [Contact Number]
- Available: Monday to Saturday, 10:00 AM to 6:00 PM IST

- Address: Victoria Paradise Advisor LLP
[Complete Registered Office Address]

5.3 Website

- Grievance Form: [Website URL/grievance-form]
- Available: 24/7 online submission

5.4 SEBI SCORES Portal

- Portal:
 - <https://scores.sebi.gov.in/>
 - Direct lodging on SEBI platform (described in Section 8)
-

6. GRIEVANCE RESOLUTION PROCESS

Step 1: Receipt and Acknowledgment

Timeline: Within 6 hours of receipt

Upon receiving a grievance through any channel, VPW will:

1. Issue a unique Grievance Registration Number (GRN) in the format: VPW/GR/YYYY/XXXXX (May be or may be not)
2. Send an acknowledgment to the complainant via email within 6 hours
3. Provide contact details of the assigned Grievance Officer
4. Inform the complainant about the expected resolution timeline

Acknowledgment will include:

- Grievance Registration Number (GRN)
 - Date and time of receipt
 - Brief summary of the grievance
 - Assigned officer's name and contact details
 - Expected resolution timeline
 - Escalation process (if needed)
-

Step 2: Classification and Assignment

Timeline: Within 12 hours of receipt

The grievance will be:

1. Classified by nature (transaction, service, advisory, data protection, staff conduct, etc.)
 2. Assigned priority level (Critical, High, Medium, Low) based on severity and regulatory implications
 3. Assigned to appropriate personnel for investigation and resolution
 4. Logged in the Grievance Register with all relevant details
-

Step 3: Investigation and Analysis

Timeline: Within 4 business days of receipt

The assigned officer will:

1. Gather all relevant facts, documents, and transaction records
 2. Interview involved staff members, if necessary
 3. Review applicable policies, procedures, and regulatory requirements
 4. Analyze the root cause of the grievance
 5. Determine appropriate resolution or remedial action
 6. Prepare draft Action Taken Report (ATR)
-

Step 4: Resolution and Communication

Timeline: Within 6 business days of receipt

VPW will:

1. Finalize the resolution and prepare Action Taken Report (ATR)
2. Communicate the resolution to the complainant via email and phone
3. Provide clear explanation of findings and corrective actions taken
4. If complaint is not upheld, provide detailed reasons with supporting evidence
5. Offer alternative escalation options if complainant remains unsatisfied

ATR will include:

- Grievance details and classification
 - Investigation summary
 - Findings and conclusion
 - Resolution provided or reasons for rejection
 - Remedial actions taken
 - Preventive measures implemented
 - Escalation options available
 - Contact details for further assistance
-

Step 5: Closure and Follow-up

Timeline: Within 2 business days of resolution

1. Seek confirmation from complainant regarding satisfaction with resolution
 2. Update Grievance Register with closure status
 3. Conduct root cause analysis for systemic improvements
 4. Implement preventive measures to avoid recurrence
 5. Archive all grievance-related documents for regulatory compliance
-

7. ESCALATION MATRIX

If a complainant is not satisfied with the resolution provided at any tier, the following escalation process applies:

Stage	Authority	Timeline for Resolution	Mode of Escalation
Level 1	Customer Service Manager	6 business days	Email, Phone, WhatsApp
Level 2	Compliance & Grievance Redressal Officer	6 business days	Email, Phone
Level 3	Principal Officer / Director	6 business days	Email, Written Request
External - SEBI SCORES	SEBI Designated Body	21 calendar days (Entity ATR) + 10 days (Designated Body review)	SEBI SCORES Portal

Final - SEBI Review	SEBI Office of Investor Assistance	As per SEBI timeline	SEBI SCORES Platform
---------------------	------------------------------------	----------------------	----------------------

Note: Complainants may escalate directly to SEBI SCORES at any stage if they are dissatisfied with VPW's response or if VPW fails to respond within the committed timeline.

8. SEBI SCORES GRIEVANCE MECHANISM

8.1 About SEBI SCORES

SCORES (SEBI Complaints Redress System) is an online platform for lodging and tracking complaints against SEBI-registered entities. Complaints on SCORES follow a structured review process.

SCORES Portal:

<https://scores.sebi.gov.in/>

SEBI Helpline: 1800 22 7575 / 1800 266 7575

8.2 When to Approach SEBI SCORES

Complainants may lodge complaints on SCORES when:

1. VPW has rejected the complaint or not responded within stipulated timeline
2. Complainant is not satisfied with VPW's resolution
3. Within one year from the date of occurrence of the cause of action

8.3 SCORES 2.0 Process Flow

Stage 1: Complaint Lodging and Entity Response

- Investor registers on SCORES portal and lodges complaint
- Complaint is automatically forwarded to VPW
- VPW uploads Action Taken Report (ATR) within 21 calendar days
- ATR is automatically routed to complainant

Stage 2: First Review (by Designated Body)

- If complainant is not satisfied, they may seek first review within 15 calendar days
- Designated Body (NSE/BSE/AMFI) reviews the complaint
- Designated Body ensures quality of redressal
- Revised ATR uploaded within 10 calendar days

Stage 3: Second Review (by SEBI)

- If still unsatisfied, complainant may seek SEBI review within 15 calendar days
- SEBI examines complaint and stakeholder responses
- SEBI issues final disposal with reasoned closure remarks
- Complainant may opt for Online Dispute Resolution (ODR) if needed

8.4 VPW's Commitment on SCORES

VPW commits to:

1. Respond to all SCORES complaints within 21 calendar days (as mandated)
 2. Upload comprehensive ATR with supporting documents
 3. Address all designated body and SEBI queries promptly
 4. Continuously monitor SCORES complaints and improve service quality
 5. Maintain zero pending complaints on SCORES platform
-

9. ONLINE DISPUTE RESOLUTION (ODR)

If the complainant remains unsatisfied even after SEBI review on SCORES, they may opt for Online Dispute Resolution through Conciliation/Arbitration.

ODR Portal:

<https://smartodr.in/>

Process:

1. Complainant opts for ODR after exhausting SCORES process
2. Matter is referred to qualified conciliator/arbitrator
3. Online hearings and submissions conducted
4. Binding resolution provided within prescribed timelines

Alternative Remedies:

Complainants also have the right to approach:

- Consumer Courts (District/State/National level)
 - Civil Courts for legal remedies
 - Any other appropriate legal forum
-

10. GRIEVANCE CATEGORIES AND EXPECTED RESOLUTION

Grievance Category	Examples	Standard Resolution Time
Transaction-related	Purchase/redemption delays, wrong NAV applied, SIP failures	3-6 business days
Documentation	Non-receipt of statements, incorrect transaction confirmations	2-5 business days
Service Quality	Poor response time, incomplete information	3-6 business days
Advisory	Unsuitable recommendations, mis-selling allegations	5-6 business days (requires detailed review)
Staff Conduct	Unprofessional behavior, harassment	4-6 business days + disciplinary action
Data Protection	Unauthorized data sharing, privacy breaches	Immediate action + 6 business days for resolution
Commission/Fees	Incorrect charges, lack of disclosure	3-6 business days

Technical Issues	Website/app problems, login issues	1-3 business days
------------------	------------------------------------	-------------------

11. RECORD KEEPING AND REPORTING

11.1 Grievance Register

VPW maintains a comprehensive Grievance Register (physical and electronic) containing:

- Grievance Registration Number (GRN)
- Date and time of receipt
- Complainant details (name, contact, client ID)
- Nature and category of grievance
- Channel through which received
- Priority level assigned
- Investigation officer assigned
- Actions taken and resolution provided
- Date of resolution/closure
- Complainant satisfaction status
- Escalation details (if any)
- Lessons learned and preventive actions

11.2 Monthly Grievance Report

VPW may (may not) publishes a monthly grievance report on its website by the 10th of every month, containing:

- Total number of grievances received during the month
- Category-wise breakup of grievances
- Number of grievances resolved within timelines
- Number of grievances pending beyond timelines
- Number of SCORES complaints received and resolved
- Average resolution time
- Key trends and areas of concern
- Corrective measures taken

11.3 Retention Policy

All grievance-related records will be retained for a minimum period of 8 years from the date of closure, as per SEBI requirements.

12. REVIEW AND CONTINUOUS IMPROVEMENT

12.1 Periodic Review

- Monthly: Grievance trends analysis and service gap identification
- Quarterly: Root cause analysis and preventive action effectiveness review
- Annually: Comprehensive policy review and update

12.2 Client Feedback

VPW seeks feedback from complainants after grievance resolution through:

- Post-resolution satisfaction survey (email/SMS)
- Net Promoter Score (NPS) for grievance handling
- Testimonials and suggestions for improvement

12.3 Training and Awareness

- Regular training for all staff on grievance handling procedures
 - Sensitization programs on client-centric service delivery
 - Updates on regulatory changes and best practices
 - Case study-based learning from past grievances
-

13. EXCLUSIONS

The following matters will NOT be covered under this Grievance Redressal Policy:

1. Complaints against Asset Management Companies (AMCs) or fund houses (to be directed to respective AMC)
 2. Market-related grievances or scheme performance issues (inherent market risks)
 3. Matters pending before courts, tribunals, or arbitration
 4. Complaints already decided by SEBI or other regulatory authorities
 5. Anonymous complaints (unless of serious regulatory nature)
 6. Frivolous, vexatious, or repetitive complaints without new information
 7. Complaints falling under jurisdiction of other regulators (RBI, IRDAI, PFRDA)
-

14. CLIENT RIGHTS AND RESPONSIBILITIES

Client Rights:

1. Right to lodge grievance through any channel
2. Right to receive acknowledgment within 6 hours
3. Right to timely resolution within 6 business days
4. Right to escalate to higher authorities and SEBI
5. Right to confidentiality and fair treatment
6. Right to receive written ATR with reasons

Client Responsibilities:

1. Provide complete and accurate information
 2. Submit supporting documents, if required
 3. Maintain decorum and civility in communications
 4. Allow reasonable time for investigation and resolution
 5. Provide feedback on resolution quality
-

15. CONTACT INFORMATION

Victoria Paradise Advisor LLP (VPW)

Registered Office:

New dabri road, SN chowpathi, wd no.5, 736101, Cooch Behar WB

Corporate Office:

New dabri road, SN chowpathi, wd no.5, 736101, Cooch Behar WB

Grievance Redressal Officer:

Name: Sujeet Yadav

Designation: Compliance and Grievance Redressal Officer

Email:

grievances@onlyvpw.com

Principal Officer:

Name: Kundan Karmakar

Designation: CEO

Email: ceo@onlyvpw.com

Business Hours:

Monday to Saturday: 10:00 AM to 6:00 PM IST
(Closed on Sundays and National Holidays)

SEBI Contact Details:

Office of Investor Assistance and Education

Securities and Exchange Board of India

SEBI Bhavan, Plot No. C4-A, 'G' Block

Bandra-Kurla Complex, Bandra (E)

Mumbai - 400 051

Email:

sebi@sebi.gov.in

Toll-Free Helpline: 1800 22 7575 / 1800 266 7575

SCORES Portal:

<https://scores.sebi.gov.in/>

16. POLICY REVIEW AND AMENDMENTS

This Grievance Redressal Policy will be reviewed annually and updated as necessary to reflect:

- Changes in regulatory requirements
- Feedback from clients and stakeholders
- Best practices in the industry
- Operational improvements

Any material changes will be communicated to clients and published on VPW's website at least 30 days before implementation.

17. DECLARATION

Victoria Paradise Advisor LLP (VPW) is committed to the highest standards of client service and grievance redressal. This policy reflects our dedication to transparency, fairness, and regulatory compliance. We view every grievance as an opportunity to improve and strengthen our relationship with clients.

For any queries regarding this policy, please contact our Grievance Redressal Officer.

Document Prepared in Compliance with:

- SEBI (Mutual Funds) Regulations, 1996
 - AMFI Code of Conduct for Mutual Fund Distributors
 - SEBI Circular on SCORES 2.0 (SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023)
 - SEBI Master Circular on Processing of Investor Complaints
-

Victoria Paradise Advisor LLP

Director AMFI ARN: [To be added]

Policy Effective Date: [Date]