

External Grievance Policy & Guidelines

Objective

The company is committed to maintaining fair, transparent, and accountable practices in all its interactions with external stakeholders, partners, vendors, and the general public. This policy outlines the process for addressing grievances or complaints from external parties regarding our services, products, or business conduct, ensuring that all concerns are handled fairly and resolved in a timely manner.

Applicability

This policy applies to all external stakeholders, including but not limited to suppliers, contractors, business partners and general public who wish to raise grievances regarding any aspect of the company's operations, conduct, or service delivery. This External Grievance Policy shall also be reviewed and amended from time to time, as necessary, on the basis of feedback received from external parties concerning this External Grievance Policy.

External Grievance Redressal Committee

The following individuals have been nominated to form the External Grievance Redressal Committee:

1. Chairperson and Representative of the company: Mr. Amarendra Pathak, Managing Director Client Origination and Coverage
2. Representative of the company: Shilpa Dadhich – Director Compliance
3. Representative of an external party: Ms. Jyoti Tandon, Consultant

The constitution of the committee, including members and external representation, will be reviewed from time to time in accordance with the law.

Procedure for Reporting an External Grievance

Grievances that may be reported under this policy include but are not limited to:

- Service-related issues, including delays or disputes
- Ethical concerns, including corruption, fraud, or misconduct
- Harassment, discrimination, or unfair business practices
- Breach of contract or non-compliance with agreements
- Violation of legal, regulatory, or policy requirements

To ensure that grievances and complaints are addressed efficiently and fairly, we have implemented the following procedure for reporting and addressing grievances:

1. Filing a Grievance

External parties can report grievances:

- In writing to the company's designated grievance contact point at external.grievance@waterfieldadvisors.com
- If the grievance concerns a particular department, the external party can directly contact the department head or the appropriate representative from the Grievance Redressal Committee.

2. Required Information for Filing

To ensure that grievances are effectively investigated, the complainant should provide the following details:

- Full Name and contact information of the complainant
- A clear and concise description of the issue or grievance
- Relevant details such as dates, times, and specific instances



- Names of individuals involved (if applicable)
- Any supporting documents, photos, or videos
- Witness statements (if applicable)
- A clear statement of the desired resolution or outcome

3. Investigation Process

- **Preliminary Review:** Within 3 days of receiving a grievance, the Grievance Redressal Committee will conduct an initial review to assess the nature of the grievance and determine whether it can be resolved informally or requires a formal investigation.
- **Formal Investigation:** If the grievance requires a formal investigation, the committee will:
 - Schedule a meeting with the complainant and relevant parties, either in person or via video call.
 - Notify all parties involved of the meeting and provide sufficient information regarding the grievance.
 - Conduct the investigation within 7 days after preliminary review, gathering statements from witnesses and reviewing any relevant documentation.
 - Ensure that no disciplinary actions are taken before the conclusion of the investigation.

4. Decision Making and Recommendations

- Upon completion of the investigation, the committee will document the findings and provide recommendations for appropriate actions.
- The complainant will be informed of the outcome within 7 days of the conclusion of the investigation.
- If the grievance concerns a department head or senior representative, the committee will notify the complainant directly.

5. Appeals Process

- If the complainant is dissatisfied with the outcome, they may file an appeal with the Grievance Redressal Committee within 5 working days.
- The committee will hold an appeal meeting within two weeks to review the grievance and may escalate the issue to management for a final resolution.
- A final decision will be communicated to the complainant in writing within one week of the appeal hearing. This will be the final step in the process.

If a grievance is not resolved satisfactorily, the complainant may escalate the matter to the CEO and/or Board Members of the company. If no satisfactory resolution is reached, the complainant may approach the appropriate regulatory body or legal authority."

Record Keeping and Tracking

The company will maintain accurate records of all external grievances, including the nature of the grievance, findings, actions taken, and outcomes. Progress reports will be submitted monthly to the Grievance Redressal Committee for review and action.

Action and Resolution

Grievances may be resolved through various measures, depending on the nature and severity of the issue:

- Offering an apology or explanation to the complainant.
- Implementing corrective actions to resolve the issue.
- Revising processes or policies to prevent recurrence.



- In cases of significant misconduct or failure, reconsidering contracts or business relationships with the involved parties.

Confidentiality

The company ensures that all grievances and the information provided will be treated with the utmost confidentiality. Information will only be shared with parties involved in the grievance resolution process and will not be disclosed without the consent of the complainant, unless required by law.

Commencement, Amendment or Termination of the Guidelines

The Company has the right to review, amend or terminate the guideline from time to time in accordance with the relevant legislation.

