

NOVUS

A stylized flame logo consisting of three overlapping, curved shapes in shades of orange and red, resembling a flame or a ribbon.

CAPITAL ADVISORS

— Empowering Ambitions Elevating Growth —

INVESTOR GRIEVANCE REDRESSAL POLICY

1. INTRODUCTION:

Novus Capital Advisors Private Limited (Formerly known as Fast Track Finsec Private Limited) (“the Company”) is committed to ensuring prompt and efficient resolution of investor complaints, along with the implementation of timely corrective and preventive measures. This policy has been developed to establish a robust and appropriate framework for receiving, addressing, and resolving investor grievances in a fair and timely manner.

The objectives of this policy are to:

- a) Ensure that all investor concerns are handled with respect and resolved within a reasonable time frame.
- b) Guarantee that all complaints are managed impartially, efficiently, and without prejudice.

2. DEFINITIONS:

- a) **Investor:** shall mean an individual, entity, body corporate or such other person who shall be an investor in securities or would be investing in securities of an entity related to any of the transactions undertaken by the company in its capacity as a Merchant Banker.
- b) **Complaint or Grievance:** is an expression of dissatisfaction made by the Investor related to the services of Novus Capital Advisors Private Limited (formerly known as Fast Track Finsec Private Limited) in its capacity as a Merchant Banker and/ or its client including in respect of any disclosure/ process/ information in any of the transaction undertaken by the company in its capacity as a Merchant Banker”. This however needs to be differentiated from matters like from general feedback, enquiry, request made before the due date.
- c) **Client/ Customer:** shall mean client/ customer of Novus Capital Advisors Private Limited (formerly known as Fast Track Finsec Private Limited).
- d) **Redressal:** can be defined as a process or action resulting in giving a solution or response to the problem faced or concern raised by an Investor.

3. GUIDING PRINCIPLES

I. Transparency: Investors will be clearly informed about the available channels for submitting their complaints and concerns. If the resolution process is expected to take more time than usual, the same will be communicated to the investor in a timely manner.

II. Accessibility: The Company will provide investors with multiple, convenient avenues to lodge their complaints and seek redressal, ensuring ease of communication and support.

III. Escalation: In case an investor is not satisfied with the resolution offered, clear information will be provided on how the matter can be escalated to a higher authority for further review.

4. RESOLUTION PROCESS:

It may be noted that only the grievances received in written form will be considered under the grievance redressal mechanism. The Investor (including potential investor)/ Customer shall address the complaint in the manner provided in “Annexure I” to this Policy.

The Compliance Officer is designated as Grievance Redressal Officer under this Policy.

SEBI in its continuous pursuit of protection of interests of investors in the securities market, SEBI has launched the new version of the SEBI Complaint Redress System (SCORES 2.0) on April 1, 2024. The new version of SCORES strengthens the investor complaint redress mechanism in the securities market by making the process more efficient through auto-routing, auto-escalation, monitoring by the ‘Designated Bodies and reduction of timelines. The new SCORES system has also been made more user friendly. SCORES is an online system where investors in securities market can lodge their complaints through web URL and an App.

The website URL for SCORES 2.0 from April 01, 2024 is <https://scores.sebi.gov.in>.

The salient features of SCORES 2.0 are as follows:

- i. Reduced and uniform timelines for redressal of investor complaints across the Securities Market i.e. 21 Calendar days from date of receipt of complaint.
- ii. Introduction of auto- routing of complaints to the concerned regulated entity so as to eliminate time lapses, if any, in the flow of complaints.
- iii. Monitoring of the timely redress of the investors’ complaints by the ‘Designated Bodies’.
- iv. Providing two levels of review: First review by the ‘Designated Body’ if the investor is dissatisfied with the resolution provided by the concerned regulated entity. Second review by SEBI if the investor is still dissatisfied after the first review.
- v. Introduction of auto-escalation of complaint to the next level in case of non- adherence to the prescribed timelines by the regulated entity or the Designated Body as the case may be.
- vi. Integration with KYC Registration Agency database for easy registration of the investor on to SCORES

5. CHANGES TO POLICY:

The Company shall reserve the rights to review and make amendment to the Policy from time to time as it deems fit in accordance with the applicable laws, rules and regulations for the time being in force. In the event of any conflict between the provisions of this Policy and the Act or Regulations or Rules or any other statutory enactments, the provisions of such Act or Regulations or Rules or statutory enactments shall prevail over this Policy. An interim review and amendment can also be carried out to accommodate minor changes, if any, on regulatory and operating front by the Compliance Officer of the Company.

Annexure I

Resolution Process:

- a) Complaints can be lodged by submitting a duly filled ‘Investor Grievance Redressal Form’ to the Grievance Redressal Officer, whose details are mentioned below:

Grievance Redressal Officer: Vikas Kumar Verma

Email: Investor@Novuscaps.com

- b) In case 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, the Investor may file their complaint in **SCORES 2.0** portal of SEBI. The Investor may lodge the Complaint against the Company on SCORES 2.0 Portal within a period of one year from the date of occurrence of the cause of action i.e., rejection of complaint or non-receipt of any communication or reply / redressal received being not satisfactory. The Scores Id for Novus Capital Advisors Private Limited (formerly known as Fast Track Finsec Private Limited) is **MCB00309**.
- c) The Investor needs to register on the SEBI SCORES 2.0 portal at <https://scores.sebi.gov.in/scores-home> by clicking on “Sign Up” and selecting the category as “Investor”. Details like Name of the Investor, Permanent Account Number (PAN), contact details, email-id, etc. are required at the time of registration on the Scores 2.0 Portal.
- d) Upon successful registration, a unique user id and a password shall be generated and communicated through an acknowledgement email to the Investor. The Investor may then proceed to submit a complaint or grievance directly to Novus Capital Advisors Private Limited under the ‘Merchant Bankers’ category.
- e) The Company shall resolve the complaint and upload the Action Taken Report (“ATR”) on SCORES 2.0 within the timeline prescribed as per the SEBI Grievance Redressal circular. The ATR uploaded by the Company will be automatically routed to the complainant.
- f) In case, the Investor is not satisfied with the resolution provided, the Investor may request for a review of the resolution provided by the entity within 15 calendar days from the date of the ATR by the Company. In case of review, the Association of Investment Bankers of India (“AIBI” or “the Designated Body”), being the Designated Body specified by SEBI, shall take cognizance of the complaint through SCORES 2.0 and seek clarifications from the Company. The Designated Body shall submit the revised ATR to the Investor on SCORES 2.0 within the timeline prescribed as per the SEBI Grievance Redressal circular.
- g) In case the Investor is not satisfied with the resolution provided after the review process stated in point (g) above, the Investor may request for a second review of the resolution provided within 15 calendar days from the date of the revised ATR by the Designated Body. In case of second review, SEBI may take cognizance of the complaint through SCORES 2.0 and seek clarifications from the Company and/or the Designated Body. The Company shall provide

clarification to the respective Designated Body and/or SEBI, wherever sought and within such timeline as specified. The second review Complaint shall be treated as 'resolved' or 'disposed' or 'closed' only when SEBI 'disposes' or 'closes' the Complaint in SCORES 2.0.

- h)** If the Investor is not satisfied with how their complaint has been handled on the SCORES 2.0 portal after SEBI's review, or if the matter involves issues that require a decision on third-party rights, legal questions, or disputes between parties, the Investor should pursue appropriate remedies through the Online Dispute Resolution (ODR) mechanism available in the securities market. Additionally, the Investor also has the right to approach other legal forums such as civil courts, consumer courts, etc.
- i)** 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 portal.
- j)** The Investor may also contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on the SCORES 2.0 platform. The list of IAs is available at www.sebi.gov.in.