



Tata Securities Limited

Grievance Redressal Policy

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1. Preamble

TATA Securities Limited ("the Company") has been issued license to act as a Point of Presence (POP) under Regulation 3 (i) i.e. National Pension System (NPS) – Distribution and servicing for public at large through physical as well as online platforms for National Pension System and other schemes regulated and administered under the provisions of the Pension Fund Regulatory and Development Authority (PFRDA) (Point of Presence) Regulations, 2018 (including amendments thereof).

As per the provisions of the PFRDA (Redressal of Subscriber Grievance) Regulations, 2015 (including amendments thereof) (Regulations), every intermediary regulated by the Authority under the National Pension System and any other pension scheme regulated by the PFRDA shall follow the grievance redressal policy as laid down by these regulations.

This Policy is being put in place to comply with the provisions of the PFRDA Act, 2013, the Regulations and any guidelines or notification issued by the Authority, relating to subscribers grievances.

2. Definition

- i. "Act" means the Pension Fund Regulatory and Development Authority Acts, 2013.
- ii. "Grievances or complaint" includes any communication that expresses dissatisfaction, in respect of the conduct or any act of omission or commission or deficiency of service on the part of, an intermediary or an entity or a person governed by the provisions of the Pension Fund Regulatory and Development Authority Acts, 2013 and in the nature of seeking a remedial action but do not include the following
 - a) complaints that are incomplete or not specific in nature;
 - b) communications in the nature of offering suggestions;
 - c) communications seeking guidance or explanation;
 - d) complaints which are beyond the powers and functions of the Authority or beyond the provisions of the Act and the rules and regulations framed there under;
 - e) any disputes between intermediaries; and
 - f) complaints that are sub-judice (cases which are under consideration by court of law or quasi-judicial body) except matters within the exclusive domain of the Authority under the provisions of the Act;
- iii. "Subscriber" means any person who lodges a complaint in accordance with the Regulations
- iv. Any dispute/compliant among the stakeholders of NPS- CRA, Corporate, Trustee bank etc will be addressed using official emails.

- v. "Request" means any communication from a subscriber soliciting a service from an intermediary under the National Pension System or an entity or a person governed by the provisions of the PFRDA Act, 2013.
- vi. "Any other pension scheme" means any other pension scheme referred to in clause (b) of sub-section (1) of Section 12 of the Act;
- vii. "Intermediary" in relation to the NPS includes pension fund, central record keeping agency, National Pension System Trust, pension fund adviser, point of presence, such other person or entity connected with collection, management, recordkeeping and distribution of accumulations.
- viii. "Ombudsman" means any person appointed under regulation 11 of these regulations and includes a Stipendiary Ombudsman.

3. Objective

The objective of this Policy is to provide a timely and seamless framework for handling grievances in the interests of the subscribers by the Company for effective resolution of such grievances.

The Company is committed to ensuring that all the grievance(s)/ complaint(s), if any arising out of various services offered by the Company as a POP are redressed in a timely and a satisfactory manner.

4. Scope and Applicability

The scope of this Policy shall be restricted to grievances / complaint(s) raised against the Company for acting as a Point of Presence under the NPS Architecture. All the Personnel working in the Registered /Corporate Office of Company shall be guided by this Policy.

5. Grievance/ Complaint Redressal Mechanism

Subscribers have a right to seek redressal of grievances in respect of the services offered by the Company (NPS registration, contribution processing, withdrawal/exit processing, non-financial transactions, etc). All grievances received by the Company will be responded to with the final decision of the Company within the prescribed regulatory time of 30 days of its receipt and a final reply shall be sent to the subscriber, containing details of resolution or rejection of the complaint, with reasons thereof recorded in writing/email.

The Subscriber has the option of registering grievance/complaint through the following alternatives:

a) <u>Call Centre</u>

Subscriber can contact Central Repository Agency (CRA) call centre at customer care number and register the grievance. On successful registration of grievance, a token number will be allotted by the Customer Care representative for any future reference.

Below are the Customer Care number of the CRAs:

- i. PROTEAN: 1-800-222080
- ii. KFintech: 1800 208 1516
- iii. CAMS: 1800-572-6557
- b) <u>Online</u>

Subscribers can register their grievance or check the status of grievance at Central Grievance Management System portal of the respective CRAs under which subscriber's PRAN is generated.

Below is the web link given of all the CRAs:

- i. PROTEAN: <u>https://www.cra-nsdl.com/CRA/</u>
- ii. KFintech: <u>https://nps.kfintech.com/</u>
- iii. CAMS: <u>https://www.camsnps.com/</u>
- c) Physical forms /Email

In case of physical mode of submission, the subscriber will have to submit a written compliant containing the Issue, PRAN, Name, Date and Signature. The subscriber can approach the Company to register the Grievance/ Complaints by writing/ email to the Grievance Redressal Officer (GRO) :

Grievance Redressal Officer – Neelam Tawde TATA Securities Limited 11th Floor, Tower A, Peninsula Business Park, Ganpatrao Kadam Marg, Lower Parel, Mumbai – 400 013 Email Id: npssupport@tatacapital.com

In case of Email support, the subscribers should email the Grievance Redressal Officer with the issue as well the PRAN. Email Id: npssupport@tatacapital.com

Note: During instances where the customer raises a complaint via Social Media, On-line Forums and other digital platforms which aren't explicitly mentioned in the policy, the subscribers will be advised to stick to the processes prescribed by the regulator and incorporated in the Grievance policy.

Unique Grievance Number:

Upon receipt of the Grievance/ Complaint, the GRO will record the complaint received in the Central Grievance Management System (CGMS) of the Central Record Keeping Agencies for generation of the Unique Grievance Number.

Acknowledgement:

An acknowledgement email/ letter shall be sent to the Subscriber within three working days of the receipt of the Grievance/ Complaint. The date of sending the acknowledgement to the subscriber shall be updated in CGMS platform.

The acknowledgement shall contain the following details

- Date of receipt of Grievance/ Complaint
- Unique Grievance Number
- Expected date for resolution of grievance
- Name, Designation and contact details of GRO handling the Grievance/ Complaint
- Grievance/ Complaint escalation matrix with contact details & address [including that of the Chief Grievance Redressal Officer, Compliance Officer, National Pension System Trust (NPST) and Ombudsman]
- Manner & mode of tracking resolution of Grievance/ Complaint with UGN and manner in which subscriber shall be intimated on resolution of Grievance/ Complaint.

If the Grievance/ Complaint is resolved within 3 working days from the date of receipt, the communication (email would suffice) of the resolution can be done along with the acknowledgement

In case the Grievance/ Complaint received does not pertain to the Intermediary to which the same has been lodged, the Grievance/ Complaint will be transferred to the concerned intermediary within three working days, under intimation to the subscriber.

The GRO shall send the Subscriber a written /email intimation which offers redressal of the grievance or rejection of the complaint recording the reason for the same.

The Grievance/ Complaint shall be deemed to be have been commenced on the first date of receipt of the Grievance/ Complaint by the Company. The Subscriber shall be intimated on resolution of Grievance/ Complaint. The intimation of resolution shall contain the date of receipt of Grievance/ Complaint, UGN (Unique Grievance number), Name, Designation and Contact details of the GRO signing the communication, procedure of representing the matter to NPS Trust (contact details and address) and further right to approach Ombudsman and PFRDA in case of nonsatisfactory resolution of Grievance/ Complaint within the specified in the regulation.

The GRO shall update the CGMS platform within one working day after sending intimation of resolution to the Subscribers.

All Grievance/ Complaint shall be escalated to the CGRO within the organization in case resolutions is pending for more than 12 days from the date of sending an acknowledgement.

Chief Grievance Redressal Officer – Riddhi Panchmatiya 11th Floor, Tower A, Peninsula Business Park, Ganpatrao Kadam Marg, Lower Parel, Mumbai – 400 013 Email Id: Npssupport@tatacapital.com

CGRO will ensure disposal of the Grievance/ Complaint within a period of 30 days of its receipt.

Further, the Compliance Officer shall oversee and ensure the compliances of said framework.

Name		Grievance designation
Level 1	Neelam Tawde	Grievance Redressal Officer
Level 2	Riddhi Panchmatiya	Chief Grievance Redressal Officer
Level 3	Sonam Punjabi	Compliance Officer

6. Escalation of Grievance/ Complaint to National Pension System Trust

Any Subscriber whose Grievance/ Complaint has not been resolved within thirty days from the date of its receipt or the Subscriber is not satisfied with the resolution provided by the Company may register a Grievance/ Complaint against the Company with the National Pension System (NPS) Trust.

In such case, NPS Trust shall follow up the Grievance/ Complaint with the Company for redressal of the Subscriber Grievance and shall call for the resolution of the Subscriber Grievance/ Complaint and respond to the Subscriber within thirty days from the date of the receipt of Grievance/ Complaint.

7. Appeal to Ombudsman

Any Subscriber whose Grievance/ Complaint has not been resolved by the Company within thirty days from the date of submission of the Grievance/ Complaint to the NPS Trust or the Subscriber is not satisfied with the resolution provided by the NPS Trust shall prefer an appeal to the Ombudsman against TSL

The name, address and contact details of Ombudsman:

Shri Narender Kumar Bhola

Ombudsman Pension Fund Regulatory and Development Authority B-14/A, Chatrapati Shivaji Bhawan, Qutab Institutional Area, Katwaria Sarai, New Delhi – 110 016 Email Id: ombudsman@pfrda.org.in Landline No.: 011-26517507 Ext: 188

8. Closure of Grievance/ Complaint

The Grievance/ Complaint shall be considered as disposed off and closed in any in the following cases:

- > The Company has acceded to the request of the subscriber fully.
- Where the subscriber has indicated in writing/email, its acceptance of the response of the Company
- The subscriber has not responded within 45 days of the receipt of the written response from the Company.
- GRO has certified to the Subscriber that the Company has discharged its contractual, statutory and regulatory obligations and therefore closes the Complaint.
- Where the subscriber has not preferred any appeal within 45 days from the date of receipt of resolution or rejection of the Grievance/ Complaint communication by the Company.
- > Where the decision of the Ombudsman in appeal has been communicated to the subscriber.

Provided that the closure shall not be applicable where the Ombudsman or the regulator (PFRDA) as the case may be has allowed filing of the appeal, beyond the specified period.

9. Maintenance of Records and Reporting

The Company shall preserve records pertaining to Grievance/ Complaint received by it and the measures taken by it for its redressal for period of five years after the date of closure of the Grievance/ Complaint. The GRO shall submit reports as per the guidelines prescribed by the Authority.

10. Review of Policy

This policy has been approved by the Board of Directors of the Company and will be reviewed annually.

The Policy would be available on the Company's website and all the Branches including Corporate / Registered office of the Company.