INVESTOR GRIEVANCE REDRESSAL POLICY

Standard Operating Procedure & Automated Workflow Architecture

ENTITY: AAA Institutional Securities Pvt Ltd **SEBI REG NO: INZ000336432** **BSE MEMBER CODE: 6997**

1. REGULATORY FRAMEWORK & POLICY PURPOSE

AAA Institutional Securities Pvt Ltd is committed to maintaining the highest standards of transparency, integrity, and investor protection in alignment with guidelines mandated by the Securities and Exchange Board of India (SEBI) and the Bombay Stock Exchange (BSE).

> **Compliance Mandate:** This document outlines the official Investor Grievance Mechanism and Workflow Automation Architecture. It serves as institutional proof of compliance with SEBI circulars on grievance handling, investor charters, SCORES 2.0 integration, and the Online Dispute Resolution (SMART ODR) framework.

2. GRIEVANCE REDRESSAL FLOWCHART & ESCALATION STAGES

All incoming complaints follow a strict, automated 3-tier escalation path to ensure timely resolution within prescribed statutory limits (maximum T+21 calendar days).

FIGURE 1: END-TO-END COMPLAINT LIFECYCLE & ESCALATION HIERARCHY



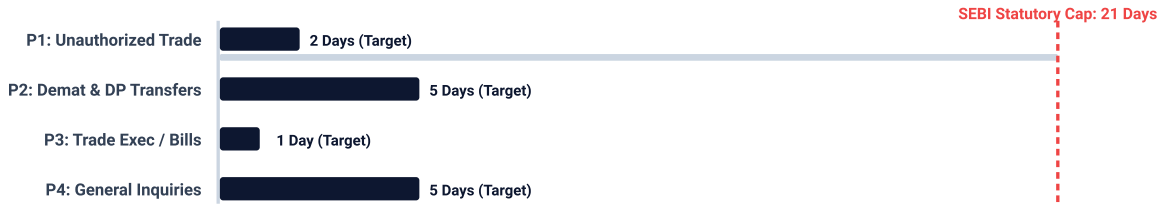
3. SERVICE LEVEL AGREEMENT (SLA) MATRIX

Grievances are prioritized based on category and financial impact. The table below details internal targets versus mandatory SEBI statutory limits.

PRIORITY	GRIEVANCE CATEGORY	L1 TARGET	L2 ESCALATION	SEBI STATUTORY MAX
P1 - Critical	Unauthorized Trading / Fund Misappropriation	48 Hours	Day 4	21 Days (Mandatory T+21)
P2 - High	Demat/DP Transfer Delays & Corporate Actions	5 Days	Day 10	21 Days (Mandatory T+21)

PRIORITY	GRIEVANCE CATEGORY	L1 TARGET	L2 ESCALATION	SEBI STATUTORY MAX
P3 - Medium	Contract Notes, Trade Execution & Billing Queries	1 Day	Day 12	21 Days (Mandatory T+21)
P4 - Low	General Portal Queries, KYC & Profile Updates	5 Days	Day 14	21 Days (Mandatory T+21)

FIGURE 2: INTERNAL SLA RESOLUTION SPEED VS SEBI STATUTORY UPPER LIMIT (DAYS)



4. TECHNICAL WORKFLOW & AUTOMATION SPECIFICATIONS

To ensure zero compliance breaches, incoming grievances are automatically processed via a background execution engine. Below is the operational specification of the ticket generation and auto-escalation system:

- **Automated Ticket ID Generation:** Every complaint generates a immutable reference ID formatted as `AAA-GRV-YYYYMMDD-XXXX`.
- **Auto-Acknowledgment:** System sends an instant SMS and Email confirmation to the investor within 60 seconds of submission.
- **Automated Day-18 SEBI Breach Alert:** If a ticket remains unresolved on Day 18 (72 hours prior to SEBI T+21 limit), an urgent alert is dispatched to the Board and Compliance Officer.

```
// Automated Ticket Payload Specification { "ticket_id": "AAA-GRV-20261103-0842", "sebi_registration_no": "INZ000336432", "bse_member_code": "6997", "client_code": "CL-INST-9942", "category": "UNAUTHORIZED_TRADING", "priority": "P1_CRITICAL", "assigned_officer": "compliance@aaa-securities.com", "created_at": "2026-11-03T10:00:00Z", "sebi_deadline": "2026-11-24T10:00:00Z", "status": "AUTO_ESCALATED_L2" }
```

5. EXTERNAL DISPUTE RESOLUTION PORTALS

If an investor is not satisfied with the internal resolution provided by AAA Institutional Securities Pvt Ltd, they can access external regulatory grievance mechanisms:

1. **SEBI SCORES 2.0 Portal:** Investors can lodge grievances directly with SEBI at scores.sebi.gov.in.
2. **SMART ODR Portal:** Online Dispute Resolution platform for conciliation and arbitration in the Indian securities market at smartodr.in.

6. COMPLIANCE & STATUTORY CONTACT DIRECTORY

For escalation of unresolved complaints or regulatory inquiries, investors may contact our designated compliance team:

DESIGNATION	OFFICER NAME	CONTACT DETAILS
Compliance Officer	Mayank Sharma	Phone: +91 9891441437 Email: compliance@aaa-securities.com
Managing Director / CEO	Executive Desk	Email: info@aaa-securities.com Phone: +91 9667733801
Corporate Office Address	14 Community Centre, New Friends Colony, New Delhi – 110065	
Registered Office Address	B-16A, Plot No.5, Community Centre, New Friends Colony, New Delhi – 110065	