

# Qode

**Customer Grievance Mechanism &  
Dispute Resolution Policy**

## ***Introduction***

Qode Advisors LLP ("the firm") is committed to providing excellent portfolio management services to its investors while maintaining the highest standards of customer service. This Investor Grievance Redressal Policy ("Policy") has been formulated to ensure that all grievances and complaints from investors are addressed promptly, fairly, and effectively.

The firm recognizes that investors may have concerns, complaints, or suggestions regarding our services, and we are committed to resolving these issues through a structured and transparent grievance redressal mechanism in compliance with the Securities and Exchange Board of India (SEBI) regulations.

## ***Objective***

The primary objectives of this Policy are to:

- Establish a systematic approach for handling investor grievances
- Ensure timely and effective resolution of investor complaints
- Maintain transparency in the grievance redressal process
- Comply with SEBI regulations and guidelines
- Continuously improve service quality based on investor feedback
- Build and maintain investor confidence and trust

## ***Grievance Redressal Framework***

### **Internal Grievance Handling Process:**

The firm has established a three-tier grievance redressal mechanism to ensure efficient resolution of investor complaints:

#### **LEVEL 1: INVESTOR RELATIONS (IR)**

**Role:** Your first point of contact for all queries – from portfolio updates to operational requests

**Response SLA:** Within 1 business day.

**Contact:** [investor.relations@qodeinvest.com](mailto:investor.relations@qodeinvest.com) or WhatsApp IR Desk

**LEVEL 2: COMPLIANCE OFFICER**

**Role:** If an issue isn't resolved by IR, its escalated to the Compliance Officer for review and redressal.

**Scope:** Regulatory matters, delayed responses, or unresolved service issues.

**Escalation Timeline:** Within 24 hours of non-resolution at Level 1.

**Contact:** [compliance@qodeinvest.com](mailto:compliance@qodeinvest.com)

**LEVEL 3: PRINCIPAL OFFICER**

**Role:** Final level of escalation, handled directly by the Principal Officer

**Scope:** Persistent grievances or concerns requiring senior oversight

**Escalation Timeline:** If unresolved at Compliance level, within prescribed timeframes.

**Contact:** [karan.salecha@qodeinvest.com](mailto:karan.salecha@qodeinvest.com)

**Escalation to External Forums**

If investors are not satisfied with the Company's resolution, they may escalate their grievances to the following external forums:

**SEBI SCORES PORTAL**

You can lodge your complaint to SEBI at <https://scores.sebi.gov.in/> or you may also write to any of the offices of SEBI. For any queries, feedback or assistance, please contact the SEBI office on Toll-Free Helpline at 1800 22 7575 / 1800 266 7575. SCORES may be accessed through the SCORES mobile application as well. The same can be downloaded from the link below:

<https://play.google.com/store/apps/details?id=com.ionicframework.sebi236330>

**ONLINE DISPUTE RESOLUTION (ODR) PORTAL**

ODR Portal could also be accessed, if unsatisfied with the response. Your attention is drawn to the SEBI circular no. SEBI/HO/OIAE/OIAE\_IAD-1/P/CIR/2023/131 dated July 31, 2023, on "Online Resolution of Disputes in the Indian Securities Market". A common Online Dispute Resolution Portal ("ODR Portal") which harnesses conciliation and online arbitration for resolution of disputes arising in the Indian Securities Market has been established. ODR Portal can be accessed via the following link - <https://smartodr.in/>

## **Written Communication**

Client queries or complaints may arise due to a lack of understanding or any deficiency in the services provided. A deficiency in service may include inadequate explanations, lack of clarifications, or miscommunication, which may lead to deviations from the expected standards of service delivery. Such deviations may occur either due to limitations in the available facilities or on account of the conduct or approach of staff members while interacting with clients.

1. Clients may seek clarification in respect of any query and are entitled to lodge a complaint in writing, if necessary.
2. Written queries or complaints may be sent to the following address:

***Qode Advisors LLP:***

*2<sup>nd</sup> Floor, Tree Building, Raghuvanshi Mills Compound,*

*Gandhi Nagar, Upper Worli, Lower Parel,*

*Mumbai, Maharashtra 400018.*

## **Grievance Redressal Mechanism for Persons with Disabilities (PwDs) (Accessibility Issues)**

In compliance with the SEBI circular dated July 31, 2025, the firm has established a dedicated grievance redressal mechanism to address accessibility-related complaints from persons with disabilities (PwDs).

### **1. Dedicated Channels**

- **Email:** [compliance@godeinvest.com](mailto:compliance@godeinvest.com)
- **Helpline:** +91-98203 00088 (operational Mon–Fri, 9:30 AM – 6:00 PM)
- **Web Form:** Available on <https://www.godeinvest.com/disclosure>

### **2. Process**

- All accessibility-related grievances will be acknowledged within 2 working days.
- Resolution/response will be provided within 15 working days.
- Complex issues requiring longer timelines will be communicated clearly to the complainant.

### **3. Escalation Matrix**

- Level 1: Ms. Komal Trivedi – Compliance Officer/Nodal Officer, Email: [compliance@godeinvest.com](mailto:compliance@godeinvest.com), Contact No.: +91-9820300088
- Level 2: Mr. Karan Salecha – Principal Officer & Designated Partner, Email: [karan.salecha@godeinvest.com](mailto:karan.salecha@godeinvest.com), Contact No.: +91 9820849413

## ***Record Keeping and Reporting***

The firm maintains comprehensive records of all grievances and their resolution. Monthly reports containing grievance statistics are prepared, along with an analysis of complaint trends and the effectiveness of resolutions. These reports are submitted to SEBI in accordance with regulatory requirements.

## ***Policy Review***

This Policy shall be reviewed periodically to ensure its continued effectiveness and alignment with applicable regulatory requirements.