

KUBER RESEARCH

GRIEVANCE REDRESSAL MECHANISM

(FOR ACCESSIBILITY ISSUES)

Digital Accessibility – Grievance Redressal Mechanism

In accordance with applicable SEBI requirements relating to the Rights of Persons with Disabilities Act, 2016 and rules made thereunder, Kuber Research has established a dedicated mechanism to address accessibility-related complaints from Persons with Disabilities (PwDs).

Registered Name	Raj Kishore Sharma Proprietor of Kuber Research
SEBI Registration No.	INH000029236
BSE Enlistment No.	7398
Nodal Officer – Digital Accessibility	Raj Kishore Sharma, Proprietor / Compliance Officer
Contact	info@kuberresearch.com +91 9102465918

Updated / Last Reviewed: 12 September 2026 — revised to reflect the full chain of SEBI digital-accessibility circulars applicable to Research Analysts, the updated compliance-reporting authority, and the sole-proprietorship nature of the escalation matrix.

1. Dedicated Accessibility Grievance Channels

- Email: info@kuberresearch.com
- Helpline: +91 9102465918 (Working Hours: 09:00 AM – 04:00 PM)
- Physical Address: MSO 224, 2nd Floor, DT Mega Mall, Golf Course Road, Phase-1, GURUGRAM, HARYANA – 122002

2. Grievance Process

- Accessibility-related grievances will be acknowledged promptly upon receipt.
- The grievance will be reviewed and, where necessary, coordinated with the relevant website, technology or service provider.
- Appropriate corrective action, response or reasonable assistance will be provided, as applicable.
- Where an issue requires additional time due to its nature or complexity, the complainant will be appropriately informed of the status.

3. Relationship with the General Grievance Redressal Policy

This Accessibility Grievance Redressal Mechanism is specifically intended to address digital accessibility-related issues faced by Persons with Disabilities (PwDs). It is separate from and does not replace Kuber Research's General Grievance Redressal Policy for investor/client grievances.

Under Kuber Research's General Grievance Redressal Policy, investor grievances shall be redressed immediately, but not later than 21 days from receipt of the grievance, or within such other timeline as may be prescribed by SEBI. Accessibility-related grievances will be handled through the dedicated accessibility mechanism described in this document, while remaining subject to applicable SEBI requirements.

4. Escalation Matrix

- Level 1: Nodal Officer – Digital Accessibility: Raj Kishore Sharma | info@kuberresearch.com | +91 9102465918
- Level 2: Proprietor / Compliance Officer: Raj Kishore Sharma | info@kuberresearch.com | +91 9102465918
- External escalation: Applicable SEBI grievance mechanisms, including SCORES 2.0, may be used where appropriate under the applicable SEBI framework.

Note

As Kuber Research operates as an individual, sole-proprietorship Part-Time Research Analyst, the Level 1 Nodal Officer and Level 2 Proprietor/Compliance Officer are necessarily the same individual. A complainant who remains dissatisfied after this internal escalation may proceed directly to the external escalation route (SCORES 2.0) described above.

5. Accessibility Commitment

Kuber Research is committed to improving accessibility of its digital platforms and investor-facing information and to addressing identified accessibility barriers in accordance with applicable regulatory requirements.

Applicable Standards

Kuber Research's digital accessibility efforts are guided by the Web Content Accessibility Guidelines (WCAG) 2.1, Level AA (or the latest applicable version), the Guidelines for Indian Government Websites (GIGW) framework, and the Indian Standard IS 17802, in each case as applicable to Kuber Research's digital platforms under the Rights of Persons with Disabilities Act, 2016 and SEBI's digital accessibility circulars.

6. Regulatory Reference

This Mechanism has been prepared with reference to the Rights of Persons with Disabilities Act, 2016 and rules made thereunder, and the following applicable SEBI circulars, as updated from time to time:

- SEBI Circular No. SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/111 dated 31 July 2025 – mandatory digital accessibility compliance for all Regulated Entities.
- SEBI Circular No. SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/121 dated 29 August 2025 – extension of compliance timelines and updated reporting authority for Investment Advisers and Research Analysts.
- SEBI circular dated 08 December 2025 – further clarifications, including the inclusion of digital accessibility within the Investor Charter framework.
- SEBI circular dated 31 July 2026 – further extension of the timeline for completing accessibility audits and remediation of audit findings.

7. Internal Compliance Note

The following points are for Kuber Research's own compliance tracking and are not client-facing grievance terms:

- Reporting Authority: As a Research Analyst, Kuber Research reports its digital accessibility compliance to BSE Limited, in its capacity as the Research Analyst Administration and Supervisory Body (RAASB), rather than directly to SEBI, pursuant to the 29 August 2025 circular.
- Current Timeline: Accessibility audits and remediation of audit findings are to be completed by 31 October 2026, as most recently extended by SEBI's 31 July 2026 circular. Kuber Research should confirm its current audit status against this deadline.
- Auditor Requirement: Accessibility audits must be conducted by an IAAP (International Association of Accessibility Professionals)-certified auditor.