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## **INVESTOR GRIEVANCE REDRESSAL POLICY**

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**ALPHAGREP INVESTMENT MANAGEMENT PRIVATE LIMITED (IFSC BRANCH)**

**Registered Office Address:** Unit No.12 A-05, 13 Floor, Parinee Crescenzo, G Block, Bandra Kurla Complex, Bandra (East), Mumbai – 400051, Maharashtra, India

**IFSC Office Address:** No. 1128 B, 11<sup>th</sup> Floor, Signature, 13 B Unit, Zone-1, GIFT SEZ, Gandhinagar – 382355, Gujarat, India

## ***Introduction***

**Alphagrep Investment Management Private limited** (the “Company” or “AMC”) is Company registered under Companies Act, 2013 and acts as the Investment Manager through its IFSC branch (“Fund Manager Entity”) bearing registration number IFSCA/FME/II/2022-23/044 of below mentioned Alternative Investment Fund(s) established and registered under the provisions of International Financial Services Centres Authority (Fund Management) Regulations, 2025 read with amendments and circulars (“IFSCA FM Regulations” or “Regulations”).

Axis Trustee Services Limited, Gift IFSC Branch is acting as trustee on behalf of the below-mentioned Trusts/Funds and has appointed GIFT IFSC branch of **Alphagrep Investment Management Private limited** as Investment Manager of the Funds launched (hereinafter referred to as “the FME” or “Manager”).

<b>Trust/Fund</b>	<b>IFSCA registration no</b>	<b>Trustee</b>
AlphaGrep Global Absolute Return Fund	IFSC/AIF3/2024-25/0198	Axis Trustee Services Limited, Gift IFSC Branch

The FME is responsible for managing the affairs of the Funds and formulation of policies and procedures in accordance with the Fund documents and applicable Regulations for effective implementation and management of the Fund’s investments and operations.

## ***Purpose***

Grievance is defined under this policy as a written or verbal expression of dissatisfaction against the operation of the Fund or its employees resulting from potential damage or wrongdoing to an investor or from a violation of IFSCA guidelines or related laws/regulations which may or may not request for a claim for compensation.

Grievances will include allegations such as failure to disclose conflicts of interest, misrepresentations, etc. Such grievances may be regarding the processing of drawdown transactions, distribution of units etc. Investor feedback, queries/clarifications will not be considered as instances of complaint or grievance.

Such grievances if not addressed in due course will hamper the Funds and FME’s reputation and functioning. Hence, this policy provides for the framework to be adopted by the FME with respect to effective redressal, in the event of any investor grievance.

The purpose of this policy is to develop principles for redressing investor grievances in a time bound and appropriate manner and ensuring that no complaint/grievance stays unaddressed or pending for a long period of time while promoting trust and accountability.

The Investment Manager should:

- Ensure visibility and accessibility of complaint handling process to all complainants.
- Provide access to grievance redressal policy to investors on need to know basis.
- Handle complaints professionally & in a transparent manner.
- Ensure confidentiality of complainant's information unless required for addressing the complaint.
- Ensure clear accountability for resolution and reporting of complaints.
- Ensure complaints are dealt with in a timebound manner.
- Ensure investor awareness on how to investors can raise their issues and complaints and escalate if they are not satisfied with the resolution or handling.
- Continually improve its processes & systems by taking inputs/ feedback from the investors.

***Definitions:***

- **Complaint Redressal Appellate Officer” or “CRAO”** shall be a senior level person of the investment manager designated for handling appeals of consumers against the decision taken by the Complaint Redressal Officer of the investment manager;
- **“Complaint Redressal Officer” or “CRO”** shall be an employee of the investment manager responsible for handling of complaints received from its consumers;
- **Complaint:** Communication from a consumer alleging deficiency in service, non-compliance, or any issue requiring resolution.
- **Deficiency in service:** Includes failure or delay in delivering a product/service, unethical conduct, or operational lapses.
- **Grievance:** An unresolved complaint escalated by the consumer.

**Not considered complaints:**

- Anonymous or pseudonymous submissions
- General queries or feedback without specific allegations
- Issues pending before courts or already settled
- Allegations without supporting documents
- Complaints about any unregistered/un-regulated activity

- Complaints on matters not relating to the financial products or services provided by the Regulated Entity
- References in the nature of seeking information or clarifications about financial products or services

### 1. **Obligation of the Designated Officers**

Complaint Redressal Officer (CRO) and Complaint Redressal Appellate Officer (CRAO) will ensure adherence to the following principles:

- Investors are treated fairly, reasonably, justly and in a time-bound manner always.
- Investors' data, confidentiality and privacy is always maintained through a secure environment.
- Investors are well informed about the status or resolution through appropriate channels.

### 2. **Grievance Redressal Framework**

The FME designates Complaint Redressal Officer (CRO) and Complaint Redressal Appellate Officer (CRAO) as the Investor Relation Officers who shall seek to attend to and address any Investor query/concern/grievance at the earliest.

The investors may write down their grievances at the email ID and address:

Role	Name	Contact Details
Complaint Redressal Officer (CRO)	Mr. Piyush Gupta	<a href="mailto:giftops@alphagrepim.com">giftops@alphagrepim.com</a> Unit No 1128 A and 1128 B, 11th Floor, Signature, 13 B Zone-1, GIFT SEZ, GIFT City, Gandhinagar - 382355, Gujarat, India
Complaint Redressal Appellate Officer (CRAO)	Mr. Kalpit Gajjar	<a href="mailto:compliance.in@alphagrepim.com">compliance.in@alphagrepim.com</a> Unit No 1128 A and 1128 B, 11th Floor, Signature, 13 B Zone-1, GIFT SEZ, GIFT City, Gandhinagar - 382355, Gujarat, India

Acknowledgment shall be sent **within 3 working days** of receiving a valid complaint received on above communication mode. If complaint is not accepted, investor shall be informed with reasons **within 5**

**working days.** The CRO and CRAO shall attempt the Resolution **within 15 working days**, and no later than **30 calendar days** from the date of acknowledgment. Complaint shall be considered closed upon confirmation by the investor or Notification to investor about final resolution & no response within 7 working days.

Any dispute unresolved/dissatisfied with the response of the CRO, the Investor may file an appeal to CRAO within 21 calendar days of the CRO decision communication. The CRAO shall try to dispose of the appeal with reasons preferably within **15 days**, not exceeding **30 days**.

Without prejudice to anything stated above, the Investor may further share its grievance/complaint with IFSCA within 21 days of CRAO's decision which may resolve the same in accordance with Applicable Laws.

Email: [grievance-redressal@ifsc.gov.in](mailto:grievance-redressal@ifsc.gov.in)

Online Portal: <https://ifsc.gov.in>

### **3. *Online Complaint System***

The FME may develop an online system for complaint registration and tracking, tailored to its operational scale and complexity.

### **4. *Maintenance of Records***

All documents relating to investors grievances and resolutions, including escalated matters will be maintained for record for a minimum period of Seven (7) years. The Investment Manager will submit periodic reports to IFSCA/the Trustee (for AIFs) on the complaints received, status and steps taken to address the same and/or published on our website under "Grievance Redressal Disclosures"

### **5. *Review of Policy***

This policy will be reviewed periodically, as required, considering the changes in the regulatory framework or for business or operational reasons, if any.