

# **INVESTORS GRIEVANCES REDRESSAL POLICY**

## **BACKGROUND**

India Resurgence Asset Management Business Private Limited acts as the Investment Manager (“**Investment Manager**”/ “**Company**”) to various Alternatives Investment Funds and /or their schemes (hereinafter singly referred to as the “**AIF**” and collectively as the “**AIFs**”). These AIFs are governed by the SEBI (Alternative Investment Funds) Regulations, 2012 (“**AIF Regulations**”) as well as their respective Fund Documents (i.e. Private Placement Memorandum, Indenture of Trust, Contribution Agreement, and Investment Management Agreement).

The AIFs raise capital from eligible investors (“**Investors**”), including institutional investors, corporates, family offices, business groups and high-net-worth individuals. In accordance with the AIF Regulations and the Fund Documents, Investment Manager is responsible for investor servicing, which includes maintaining investor records, providing periodic reporting, and addressing investor queries.

The Investment Manager expects all its officers and employees to be sensitive to the complaints/grievances of the investors and, in this regard, maintain the highest standards of integrity and transparency in their transactions with investors, intermediaries, and other stakeholders.

## **MECHANISM**

The Company has laid down the appropriate grievance redressal mechanism within the organization to resolve complaints and grievances. Such a mechanism shall ensure that all disputes arising are heard and disposed of in an effective manner.

## **GRIEVANCE REDRESSAL MECHANISM**

In case of any complaint/ grievance, the investor may contact our Investor Relations Officer through any of the following channels:

- **Phone:** 022- 6860 8500 between 10:00 A.M. to 06:00 P.M., Monday to Friday, except public holidays.
- **Email:** [investor.communications@indiarf.com](mailto:investor.communications@indiarf.com)
- **Letters:** Investor (s) can also send it to the following address:

*The Investor Relations Officer,  
India Resurgence Asset Management Business Private Limited,  
3<sup>rd</sup> Floor, IndiaRF, Piramal Tower, Peninsula Corporate Park, Lower Parel, Mumbai 400013*

## **ESCALATION MATRIX**

### **Level 1**

In case the investor(s) do not receive a response within the 21 days or if the investor(s) are dissatisfied with the response received from the Investor Relations Officer, the investor(s) may escalate the complaint to the next level to the Compliance Officer as indicated below:

- **Phone:** 022- 6860 8500 between 10.00 AM to 06:00 PM, Monday to Friday, except public holidays.
- **Email:** [indiarf.compliance@indiarf.com](mailto:indiarf.compliance@indiarf.com)
- **Letters**  
Investor(s) can hand over a complaint letter to the office personnel, duly sealed. investor(s) can write to us at:  
*The Compliance Officer*  
*India Resurgence Asset Management Business Private Limited,*  
*3<sup>rd</sup> Floor, Piramal Tower, Peninsula Corporate Park, Lower Parel, Mumbai 400013*

### **Level 2**

In case the investor (s) do not receive a response within 14 days from Level 1 or if the investor(s) are dissatisfied with the response received from the Compliance Officer, the investor(s) may escalate the complaint to the next level to the Managing Director/ General Counsel as indicated below:

- **Phone:** 022- 6860 8500 between 10.00 AM to 06:00 PM, Monday to Friday, except public holidays.
- **Email:** [compliance.irf@indiarf.com](mailto:compliance.irf@indiarf.com)
- **Letters**  
Investor(s) can hand over a complaint letter to the office personnel, duly sealed. investor(s) can write to us at:  
*The Managing Director/ The General Counsel*  
*India Resurgence Asset Management Business Private Limited,*  
*3<sup>rd</sup> Floor, Piramal Tower, Peninsula Corporate Park, Lower Parel, Mumbai 400013*

### **Level 3**

If the investor(s) is not satisfied with the resolution received at Level 2 or if the investor(s) does not hear from us in 14 days, then the investor(s) may escalate their grievance to the SEBI through the SCORES portal/ Smart ODR portal as per applicable SEBI circulars. The Company shall update the action taken report (ATR) along with supporting documents, if any, electronically in SCORES. The proof of dispatch of the reply of the Company to the investor concerned should also be uploaded to SCORES and preserved by the Company for future reference. A complaint shall be treated as resolved/disposed/closed only when SEBI disposes/closes the complaint in SCORES. Failure by the Company to file ATR under SCORES within 7 days of the date of receipt of the complaint shall not only be treated as failure to furnish information to SEBI but shall also be deemed to constitute non-redressal of investor complaint.

Investors may send their complaints to: Office of Investor Assistance and Education, Securities and Exchange Board of India, SEBI Bhavan. Plot No. C4-A, G' Block, Bandra- Kurla Complex, Bandra (E), Mumbai - 400 051.

- SEBI SCORES Platform: Investors have the option to raise a grievance or complaint through the SEBI Scores Platform at <http://scores.gov.in>
- SMART ODR Portal: Investors have the option to raise a grievance or complaint through the SMART ODR Portal at <https://smartodr.in/>

### **MATTERS NOT IN THE PURVIEW OF THE POLICY**

The following matters are kept outside the ambit of this Policy and will not be dealt with as complaint /grievance:

- incomplete or un-specific complaints;
- anonymous complaints (except whistleblower complaints);
- complaints on matters not relating to the financial products or services provided by the AIFs registered with SEBI;
- personal allegations against officials will not be regarded as Complaint, but they may be looked into by the Company at an appropriate level;
- complaints about any unregistered/ un-regulated activity;
- matters which are pending before judicial / quasi-judicial authorities are out of the purview of being entertained as Complaint / Grievance; and
- references in the nature of seeking information or clarifications about financial products or services offered by the AIFs.

### **REVIEW OF POLICY**

This Investment Manager will review this policy from time to time or as and when there are changes in regulatory framework or operational reasons.