

**EAAA India Alternatives Limited \_IFSC Branch**  
**(formerly known as Edelweiss Alternative Asset Advisors Limited – IFSC Branch)**

**Investor Grievances Redressal Policy**

<b>Title</b>	Investor Grievances Redressal Policy
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<b>Policy Owner</b>	Compliance

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## **INVESTORS GRIEVANCES REDRESSAL POLICY**

### **Tittle**

This Policy shall be called 'Investor Grievance Redressal Policy'.

### **Preamble**

EAAA India Alternatives Limited (Formerly known as Edelweiss Alternative Asset Advisors Limited) ("**EAAA**") acts as the Investment Manager ("**IM**") for various Alternatives Investment Funds and /or their schemes registered with SEBI (hereinafter singly referred to as the "**Domestic AIF**" and collectively as the "**Domestic AIFs**").

EAAA FME Branch (a Branch of EAAA) is registered as Fund Management Entity – Non-Retail ("FME – Non-Retail") under the International Financial Services Centres Authority (Fund Management) Regulations, 2022 ("FME Regulations"). EAAA FME Branch shall act as the fund management entity for all the AIFs registered with International Financial Services Centres Authority ("IFSCA") under the FME Regulations. EAAA FME Branch will be providing fund management services to various GIFT IFSC based AIFs registered/to be registered with IFSCA ("GIFT AIFs") in capacity as the FME – Non Retail. All these GIFT AIFs would be governed by the FME Regulations including the applicable circulars, guidelines etc. issued by IFSCA from time to time, as well as their respective Fund Documents (i.e. Private Placement Memorandum, Indenture of Trust, Contribution Agreement/Limited Liability Partnership Agreement and Investment Management Agreement) (hereinafter referred to as the "Fund Documents")

### **Philosophy**

Being part of the Edelweiss Group, EAAA FME Branch believes that providing prompt and efficient service to the client is essential not only to attract new investors, but also to retain the existing ones. This policy aims at minimizing the instances of Investor complaints/grievances through a framework of proper service delivery and review mechanism as well as to ensure prompt redressal of investor complaints/grievances. The review mechanism is particularly important as it will help in identifying shortcomings in product features and service delivery to make further improvements.

### **Objective**

1. This Policy is formulated to provide efficient services to the investors and to effectively address and redress the grievances of the investors of GIFT AIFs in a timely manner.
2. The coverage of this policy is to redress the grievance of investor of all the GIFT AIFs).

## **Definition:**

“**Complaint**” means matter initiated / escalated in writing (through the registered email or through paper with registered signature) to CRO / any other complaint related platform/email id created by Regulatory Authority.

(an indicative list of matters not considered as ‘complaint’ is mentioned at Schedule-I)

“**Complaint Redressal Officer**” or “**CRO**” shall be an employee of EAAA FME Branch responsible for handling of complaints received from its consumers

“**Complaint Redressal Appellate Officer**” or “**CRAO**” shall be a senior level person of EAAA FME Branch designated for handling appeals of consumers against the decision taken by the Complaint Redressal Officer of the EAAA FME Branch;

“**Grievance**” means any issue, displeasure, deficiency expressed by investors and submitted in writing (through the registered email or through paper with registered signature) to their RM / EAAA FME Branch.

## **Guiding Principles**

EAAA FME Branch’s policy on Grievance Redressal is based on the under noted guiding principles:

- The Investors will always be treated fairly;
- Complaints raised by any Investors will be dealt in timely manner and with due courtesy;
- Compliance Officer of EAAA FME Branch shall act as Complaint Redressal Officer” or “CRO” and Principal Officer of EAAA FME Branch shall act as Complaint Redressal Appellate Officer” or “CRAO”.
- EAAA FME Branch will deal with all complaints efficiently and fairly being deeply cognizant of the fact that the smallest of complaints can damage the institution’s reputation and standing, if not attended properly; and
- All the employees of EAAA FME Branch will work in good faith and without prejudice to the interests of the Investor(s).

## **Investor Service Timelines and Redressal Mechanism**

In order to make redressal mechanism more meaningful and effective, a structured system will function at EAAA FME Branch, which will ensure that redressal sought is just and fair and done in a timely manner.

The Internal Mechanism to be followed by EAAA FME Branch to handle Investor complaints/grievances will be as follows:

- a. The Investors can raise their Grievance either directly to EAAA FME Branch or to Representative of

EAAA FME Branch or to the fund administrator by giving details of their name, folio no., name of the fund invested in, nature and full particulars of their complaint

- b. The Compliance Officer of EAAA FME Branch is responsible to ensure timely and prompt communication with Investors and distributors. Investors can write to EAAA for any queries / clarifications that they may have.
- c. On receipt of grievances, EAAA FME Branch needs to ensure that it is responded / clarified / resolved in the reasonable time.
- d. If the Investor not satisfied with the response / clarification / resolution provided for the grievance, he/she can escalate the matter / complaint to the CRO of EAAA FME Branch ("Complaint").
- e. On receipt of a Complaint, CRO of EAAA FME Branch shall make an assessment on the merits of the complaint. Pursuant to assessment:
  - i. In case of acceptance, EAAA FME Branch shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
  - ii. In case of non-acceptance, EAAA FME Branch shall inform the complainant within 5 working days along with reasons.
- f. EAAA FME Branch shall examine and process the complaint in a fair, transparent, professional and impartial manner
- g. EAAA FME Branch may ask for additional information from the complainant while processing the complaint. No complaint will be acknowledged by EAAA FME Branch without sufficient information. A last receipt date of full and complete information about the complaint will be treated as the date of complaint.
- h. Multiple correspondence / communications or reminders received for the same matter within the stipulated turnaround time in this Policy for handling of the query / communication will be treated as one complaint.
- i. In case of rejection of a Complaint, EAAA FME Branch shall give reasons for rejection of the Complaint, in writing.
- j. After examining the matter, EAAA FME Branch shall dispose of Complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of Complaint. EAAA FME Branch may either resolve the Complaint or reject the Complaint. In case of rejection of a Complaint, EAAA FME Branch shall give reasons for rejection of the Complaint, in writing.
- k. . Provided that in case the resolution is expected to take longer time period, then an intermediate

response shall be made to the Investor intimating the expected timeline of the resolution.

- l. If a complainant is not satisfied with the resolution provided by EAAA FME Branch or if the complaint has been rejected by EAAA FME Branch, the complainant may file an appeal before the CRAO of EAAA FME Branch preferably within 21 days from the receipt of the decision from the CRO.
- m. The CRAO shall dispose of the Appeal within a period of 30 days
- n. Complaints turned into dispute /litigation shall be handled as per the provisions of the Fund documents.
- o. All grievance resolutions shall be undertaken as per the FME regulations and within the framework of the Fund documents of the respective FME AIFs.
- p. While the responsibility of resolution of any complaint rests with EAAA FME Branch, the services of Fund Administrator may be used for all communication with the investor w.r.t any Complaint.

**Complaint before the Authority:**

Where a complainant is not satisfied with the decision of EAAA FME Branch and has exhausted the appellate mechanism of EAAA FME Branch, he may file a Complaint before the Authority through email to [grievance-redressal@ifsc.gov.in](mailto:grievance-redressal@ifsc.gov.in) preferably within 21 days from the receipt of the decision from EAAA FME Branch:

**Maintenance of records:**

EAAA FME Branch shall maintain all records relating to handling of complaints, including the following:

- i. Complaints received and processed;
- ii. All correspondence exchanged between EAAA FME Branch and the complainants;
- iii. All information and documents examined and relied upon by EAAA FME Branch while processing of the complaints;
- iv. Outcome of the complaints;
- v. Reasons for rejection of complaints, if any;
- vi. Timelines for processing of complaints; and
- vii. Data of all complaints handled by it.

b) EAAA FME Branch shall maintain records in electronic retrieval form for the same period as mandated by IFSCA under the relevant and applicable regulations and circulars, handbooks, guidelines thereunder:

Provided that in case there is no specific mention of such time period, the record shall be maintained for at least six years from the date of disposal of complaint:

Provided further that in case of any pending litigation or legal proceeding relating to the complaint, the record shall be maintained for the applicable period, after final disposal of the proceeding.

**Reporting:**

EAAA FME Branch shall file reports on handling of complaints in the form and manner specified by the IFSCA from time to time

The Annual Report of the respective fund/scheme shall have a section with heading “Complaint Handling and Grievance Redressal”. The section shall also provide data of all complaints received, resolved, rejected and pending during the year in a tabular/ graphical format.

**Amendment /waiver / exceptions**

This policy shall be reviewed periodically and the requisite updates, if any shall be made. Any deviation/waiver /exception to the provisions of this policy shall be made only after discussion with Compliance and with the approval of the Principal Officer of EAAA FME Branch.

**Schedule I:**

- 1) Anonymous complaints not sent from registered email of the investor or under the registered signature of the investor, as applicable
- 2) Incomplete or un-specific complaints
- 3) Allegations without supporting documents
- 4) Suggestions or seeking guidance/explanation.
- 5) Any service request such as transfer, pledge, change in bank details, change in address, nominations, etc.
- 5) Complaints on matters not relating to the financial products or services provided by the EAAA FME Branch
- 6) Complaints about any unregistered/ un-regulated activity
- 7) References in the nature of seeking information or clarifications about financial products or services - Routine questions / clarifications sought by the fund investors, may be relating to their investments, distribution, tax, drawdown, fund performance, investor reporting, etc.

## **ANNEXURE – Contact Details**

### **Contact Details of EAAA India Alternatives Limited (IFSC Branch) (Formerly known as Edelweiss Alternative Asset Advisors Limited (IFSC Branch))**

Office F-11, GIFT House, First Floor, Block 12, Road 1-D, Zone-1, GIFT SEZ, GIFT City, Gandhinagar - 382355, Gujarat.

Email id for sending all queries and complaints: [aaaacompliance@eaaa-gift.in](mailto:aaaacompliance@eaaa-gift.in)

#### **Details of CRO:**

Mr. Gaurav Patel

Compliance Officer

EAAA India Alternatives Limited (IFSC Branch)

[aaaacompliance@eaaa-gift.in](mailto:aaaacompliance@eaaa-gift.in)

#### **Details of CRAO:**

Mr. Daniel Bhardwaj

Principal Officer

EAAA India Alternatives Limited (IFSC Branch)

[aaaaops@eaaa-gift.in](mailto:aaaaops@eaaa-gift.in)