

COMPLAINT HANDLING AND GRIEVANCE REDRESSAL POLICY

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1. Introduction Section

Alchemy Investment Management LLP (Alchemy) strives to meet the long-term objectives of stakeholders through superior service, absolute transparency and executional efficiency. This Complaint Handling and Grievance Redressal Policy aims to ensure timely resolution of client complaints and continuous improvement in processes and fund management.

2. Policy objectives

The objective of the policy is:

- To create a platform for timely resolution of client complaints and queries
- To ensure rigor and seriousness in Client Management, by involving all stakeholders in reviewing all logged Complaints & their status
- Continuous enhancement & Improvement of processes, Fund Management & Fund offering
- To create Distributor awareness, so, they own the responsibility of reporting to us all Queries and Complains that come to them
- To create Client awareness, so they know how to connect with us directly or through the Distributor to log a query or complaint with us

3. Appointment of Complaint Redressal Appellate Officer (CRAO), Complaint Redressal Officer (CRO) and constitution of the Committee

- Any one of the Designated Partner shall be designated as Complaint Redressal Appellate Officer (CRAO) and the Compliance officer as Complaint Redressal Officer (CRO).
- The Grievance Redressal Committee, headed by the CRAO ensures fair, transparent, and professional handling of complaints.
- The Grievance Redressal Committee consists of CRAO, CRO, Group Head of Compliance and the Chief Executive Officer of parent company.
- CRO shall be responsible for handling of complaints received from its Clients or through Distributors.
- All Complaints will be placed before the Grievance Redressal Committee.
- The Grievance Redressal Committee shall examine and process the complaint in a fair, transparent, professional and impartial manner.

4. Redressal Mechanism for Clients

If the Client has any concerns or wish to register a complaint, the Client can follow the below process:

Step 1 – Name, address and telephone number of the Complaint Redressal Officer who shall attend to the Client complaints are as follows:

Name: Mr. Rakesh Kar

Address: Unit No. 1120 A, 11th Floor, Signature, Block 13B, Zone 1, GIFT SEZ, GIFT City, Gandhinagar, Gujarat - 382355, India

Phone: (91-22) 6617 1717

Email: complaints@alchemyim.com

Step 2 - If the Client is not satisfied with the response received by following the Step (1) above then he/she may escalate the concern with all relevant details by sending an email to CRAO at escalations@alchemyim.com

Step 3 - If the resolution provided at Step (1) and then Step (2) does not meet Client's expectation, he/she may approach IFSC through email to grievance-redressal@ifsca.gov.in within 21 days from the receipt of the response.

It is to be noted that this policy shall be prominently disclosed on the website of Alchemy under the heading "Complaint Handling and Grievance Redressal" along with the name and contact details of the Complaint Redressal Officer and the Complaint Redressal Appellate Officer.

Detailed grievance redressal mechanism for employees to adhere is provided in **Annexure A**.

5. Timeline for responding to Clients

The Grievance Redressal Committee will endeavour to respond to all Client Complaints / Queries within 7 working days of receipt of complaint.

6. Ensuring Distributor escalates Complaints

- Whilst the Investment Manager will ensure that the Distributor agreement carries the clause on escalating of all Queries / complaints to the Investment Manager on an Ongoing Basis.

- Business development teams will ensure that this is re-iterated to all Distributor RMs in Fund launch forums & trainings.
- The Distributors would inform the list of Complaints that they would have received from their clients, that pertain to Alchemy as their Investment Manager.

7. Type of Clients, who could log in a Complaint

Direct Clients: These clients are sourced directly by Alchemy. The concerned person who receives the complaint escalates this to the Grievance Redressal Committee.

Distributor Clients: These clients are sourced by Distributors or Referral Partners engaged by the Investment Manager. On-boarding of these clients happen in either of the 2 ways:

- Direct Client: The Fund undertakes the KYC of the clients and has access to the clients. Complaints/Queries from such clients are handled as per the process applicable to direct clients is followed.
- Omnibus Route: The investment in the Fund is through the Omnibus/Pooled account of the Distributor. Under this route, the details of the underlying clients are not known to the Fund. It is primarily the responsibility of the Distributor to ensure that the complaints are resolved effectively. And Client Queries/complaints of such clients are generally routed through the Distributor.

If any Distributor client directly contacts the Investment Manager/ Fund, then the Investment Manager / Fund must bring this to the notice of the relevant distributor immediately, with a requirement that the distributor should keep Alchemy in copy for all communication with the clients.

The Distributor may seek support from the Investment Manager if required. However the Distributor must disclose facts of any complaint having a potential threat on the Investment Manager's reputation.

8. Classification & Scope of Complaints

For the purpose of this policy, **Complaints** that fall within this scope can be broadly classified as follows:-

- Acts involving inappropriate advice, misrepresentation or inadequate disclosure of information;
- Any complaints made to regulatory or official bodies or the press or media;
- Breach of any confidentiality obligations or misuse of client data;
- Acts involving fraud, dishonesty or other offences of a similar nature by any service providers;
- Other misconduct involving non-compliance with any regulatory requirement;

An indicative list of matters not considered as 'complaint':

- Anonymous complaints (except whistleblower complaints)
- Incomplete or un-specific complaints

- Allegations without supporting documents
- Suggestions or seeking guidance/explanation
- Complaints on matters not relating to the financial products or services provided by the Regulated Entity
- Complaints about any unregistered/ un-regulated activity
- References in the nature of seeking information or clarifications about financial products or services
- Any other matters as notified by the regulator from time to time

Further, Routine Queries are not considered complaints and shall not fall within the scope of the policy. The Investment Manager tracks such client queries to ensure that they are appropriately handled by the Fund. These queries includes:

- Fund related – including pricing, marketing materials, disclosures which are relating to basic product features and offering;
- Administration related – including data integrity, accuracy, timeliness of information or correspondences and operational services etc.;
- After sales services or facilities provided by Alchemy.

9. Maintenance of records

- a) Alchemy shall maintain all records relating to handling of complaints, including the following and as notified under applicable laws from time to time:
- Complaints received and processed;
 - All correspondence exchanged between Alchemy and the complainants;
 - All information and documents examined and relied upon by Alchemy while processing of the complaints;
 - Outcome of the complaints;
 - Reasons for rejection of complaints, if any;
 - Timelines for processing of complaints; and
 - Data of all complaints handled by Alchemy.

The Complaint register format is provided in **Annexure B**.

- b) Alchemy shall maintain records in electronic retrieval form 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.

10. Reporting

- a) Alchemy shall file reports on handling of complaints in the form and manner specified under applicable laws from time to time.
- b) Alchemy shall provide data of all complaints received, resolved, rejected and pending in its Annual Report as prescribed under the applicable laws.

Annexure A

Grievance Redressal Mechanism

Particulars	Person responsible	Turnaround time
The recipient of the complaint has to forward the complaint to the Grievance Redressal Committee	The recipient of the complaint	Real time basis
Write to the complainant, acknowledging the complaint and stating that we will endeavor to respond within 7 working days time.	CRO	Real time basis
In case of non-acceptance of complaint, inform the complainant along with reasons	CRO	Within 7 working days
Mark the complaint to respective functional head with a copy to the Grievance Redressal Committee and compliance team	CRO	Real time basis
Ensure that the response is provided to the client	CRAO	Within 7 working days
Where it becomes apparent that the complaint cannot be resolved within 7 working days, a communication must be sent to the client to advise that the matter is still being reviewed and the estimated time for response must be stated	CRO	Within 7 business days
The complainant must be kept informed of the progress of the measures being taken for the complaint's resolution;	CRO	15 business days
The complaint shall be disposed off within 15 days but not later than 30 days of acceptance of complaint	CRO	Within 30 working days
Review all Complaints & their status with the Board meeting of Designated Partners	CRAO	Periodically
If a client still remains dissatisfied, he/ she/ it may be advised of what further steps are available under the regulatory system;	CRO	As and when

Note :

In case the complaint has been received via the Distributor, the Distributor is marked on all mails



Annexure B

Complaint register format

Sr. No.	Name of Client	Date of complaint	Mode of Complaint Direct or Via Distributor	Name of Fund & Share Class	Details of complaint	Date of Settlement	Manner of resolution and/or conclusion	Other remarks