

# SAMEEKSHA INVESTMENT MANAGERS LLP

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## INVESTOR GRIEVANCE POLICY

Version:	V2
Date of Approval	10.01.2025
Date of Review	22.04.2025
Approved By:	Board of Designated Partners

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## I. BACKGROUND

Sameeksha Investment Managers LLP is registered with the International Financial Services Centres Authority ('IFSCA') to operate as a Fund Management Entity ('FME') under the Non-retail Category in accordance with the IFSCA (Fund Management) Regulations 2022 ('FME Regulations') as amended from time to time.

The FME believes that service to the contributor of the Fund i.e. investor / client is a vital element for sustained business growth and ensures that contributors receive exemplary service. Prompt and efficient service is essential for retaining existing relationships and therefore, contributors' satisfaction is paramount. Queries and Complaints constitute an important aspect, and this policy details Grievance handling process through a structured Grievance redressal framework. Grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in future.

## II. OBJECTIVES OF THE POLICY

The primary objective of this policy is to establish an efficient, transparent, and fair mechanism for handling complaints and redressing grievances of consumers, in alignment with the International Financial Services Centres Authority (IFSCA) Circular F. No. IFSCA-LPRA/3/2024 dated December 02, 2024. It aims to ensure timely resolution of complaints, enhance consumer trust, and promote accountability while adhering to regulatory requirements.

## III. IFSCA REQUIREMENTS

The policy is framed pursuant to Financial Services Centres Authority (IFSCA) Circular F. No. IFSCA-LPRA/3/2024, dated December 02, 2024, which mandates all regulated entities in the IFSC to establish a robust complaint handling and grievance redressal mechanism. This policy ensures compliance with the circular's provisions, effective from January 15, 2025, to protect financial consumers and promote fair, transparent, and timely resolution of complaints.

## IV. DEFINITIONS

For the purposes of this policy

A. Complaint / Grievance shall mean and include:

- a. A written or verbal expression of dissatisfaction against the operation of the Scheme or its employees resulting from a potential damage or wrongdoing to a Customer or from a violation of IFSCA guidelines or related laws/regulations which may or may not request for a claim for compensation.

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- b. Allegations such as failure to disclose conflicts of interest, misrepresentations, etc. Such grievances may be regarding processing of drawdown transactions, distribution of units etc.

It does not include: -

- a) Anonymous complaints (except whistleblower complaints)
- b) Incomplete or un-specific complaints
- c) Allegations without supporting documents
- d) Suggestions or seeking guidance/explanation
- e) Complaints on matters not relating to the financial products or services provided by the Entity
- f) Complaints about any unregistered/ un-regulated activity
- g) References in the nature of seeking information or clarifications about financial products or service.
- h) Customer feedback, queries/clarifications;

B. Governing Body shall mean the Board of Partners of the LLP

C. Consumer shall mean a person who engaged in a financial transaction or activity with the Entity and includes a person on whose behalf the person engaged in the transaction or activity, is acting;

### V. GRIEVANCE REDRESSAL MECHANISM

Investors may raise their Complaints/ Grievances through the following modes:

- Registering the Complaint/Grievance with the CRO/Compliance Officer of the Fund through email/letter.
- Registering the Complaint/Grievance with International Financial Services Centre Authority ('IFSCA') and
- Dispute resolution mechanism, as provided below

Step 1: Registration and Acknowledgement of Complaint/Grievance

- Investors can contact Mr. Shail Shah ("CRO ") for any queries and Complaints.
- A Complaint can be registered by the Investor by contacting the CRO via email or letter as mentioned below:
  - Email: SIMLIFSC@sameeksha.capital
  - Registered Office address – Cabin No. 03-34, Third Floor, FLEXONE, Building Footprint 15C2, Block 15, Road 1C, Zone I GIFT SEZ, Gujarat International Finance Tec-City, Gandhinagar, Gujarat-382050
- Any Complaints received will be directed and acknowledged by the CRO.
- The CRO shall share the acknowledgement with the investor raising such Complaint/Grievance within 3 working days of receipt of such Complaint as confirmation for such registration.

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- In case of non-acceptance, the CRO shall inform the complainant within 5 working days along with reasons.
- The CRO shall dispose of complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint
- The CRO will keep the Investors duly informed of the status and actions taken.

Step 2: Escalation level 1: Registration of Complaint with Complaint Redressal Appellate Officer (CRAO)

In case the CRO does not respond/resolve the Complaint within 15 days from the date of receipt of such Complaint or if the investor is not satisfied with the resolution or the manner in which Complaint/Grievance is being addressed, it can be escalated to the CRAO within 21 days from the receipt of decision of CRO through:

- Name: Mr. Bhavin Shah
- Email: bhavin@sameeksha.capital
- Registered Office address - Cabin No. 03-34, Third Floor, FLEXONE, Building Footprint 15C2, Block 15, Road 1C, Zone I GIFT SEZ, Gujarat International Finance Tec-City, Gandhinagar, Gujarat-382050
- The CRAO shall dispose of the Appeal within a period of 30 days.

Step 3: Escalation level 2: Registering of Complaint with International Financial Services Centre Authority ('IFSCA')

Complaints will be investigated and redressed within reasonable time from the date of receipt of Complaint. Certain types of Complaints, involving fraud, legal inputs and third party will be acknowledged, and the turnaround time will clearly be communicated to the investor accordingly. The prompt communication of the Fund's stand on any issue is important and is done clearly in an investor friendly manner. Further, if the investor is not satisfied with the resolution or the manner in which Complaint/Grievance is being addressed, then he/she may also escalate the issue to the International Financial Services Centre Authority by contacting the concerned officers in the Investment Division of the Capital Market Department

Where an Investor/contributor/complainant is not satisfied with the decision of the CRAO, he/she/it may file a Complaint before the Authority through email to [grievance-redressal@ifsca.gov.in](mailto:grievance-redressal@ifsca.gov.in) preferably within 21 days from the receipt of the decision from the CRAO/the Fund.

## VI. DISPUTE RESOLUTION MECHANISM

Any Complaints or dispute not resolved to satisfaction of contributors as per the above Grievance redressal framework it will be resolved by settlement through conciliation or arbitration process as may be agreed under the respective agreements with the contributors.

### **VII. RECORD KEEPING**

The Fund will ensure quarterly compilation of the records of investor Complaints received against the Fund and redressal status thereof within 7 days from the end of each quarter.

All records pertaining to investor Complaints/Grievances received by the Fund and redressal of such Complaint/Grievances will be maintained by the Fund at all times as detailed in Annexure I.

### **VIII. REPORTING AND DISCLOSURE**

The Fund will comply with the applicable FME Regulations updated from time to time vis-à-vis the disclosure requirements applicable to the Fund.

The Fund/ Investment Manager will ensure disclosure of the above Grievance Redressal Mechanism in the PPM of the Fund. Such Grievance Redressal Mechanism as mentioned will also include an option for the investors to approach IFSCA, if required.

The Annual Report, if any, to be submitted to IFSCA shall include a section titled "Complaint Handling and Grievance Redressal", presenting data on complaints received, resolved, rejected, and pending.

### **IX. REVIEW OF POLICY**

The Policy will be reviewed at reasonable intervals as may be required, in light of any material changes in regulatory framework or for business or operational reasons. Any subsequent changes will form part of the Policy after the approval of the Governing Committee.

## **ANNEXURE I**

### **Records of Complaints/Grievances**

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