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INVESTOR GRIEVANCE REDRESSAL & DISPUTE RESOLUTION POLICY

applicable to

CHANAKYA CAPITAL PARTNERS IFSC LLP
(“Chanakya”)

Document Change Control

Date	Version	Description of Change	Section Reference	Proposed by	Approvedby
January 2025	1.0	Policy drafted		Compliance Team	Anil Ranka (Designated Partner)

1. INTRODUCTION & OBJECTIVE

Investor servicing is crucial for any business and more so for an entity engaged in the business of financial services where touch points with investors are on a higher side. It is essential that the Investor's grievances are minimized, given due importance and quick action is taken to address them.

To provide efficient and enhanced services to the investors/ clients (as the case may be), Chanakya has a mechanism in place to record, address grievances of Investors/ clients relating to business or services directly or through any of its authorized vendors / distributors etc.

The objective of the Investor/ Client Grievance Redressal Policy is:

- To set guidelines for handling & addressing Investor/ Client Grievances & Complaints in an effective, fair, efficient and timely manner to ensure better investor/ client experience.
- Achieve uniformity in complaints disclosed as per the requirements of the applicable laws.

This Policy is applicable to Chanakya Capital Partners IFSC LLP (hereinafter referred to as '**Chanakya**' or '**Company**') which is acting as Fund Management Entity (Non-Retail) and Portfolio Manager under International Financial Services Centres Authority (Fund Management) Regulations, 2022, as amended from time to time.

2. SCOPE

The Policy is essentially based on the below noted guiding principles:

a) Our investors will be treated fairly at all times;
b) Our investors will be fully informed of avenues to escalate their complaints / grievances within the organization and of their rights to alternative remedy if they are not fully satisfied with the response received to their complaints;
c) Chanakya will deal with all complaints efficiently and fairly;
d) Employees of Chanakya will work in good faith and without prejudice to the interests of the investors; and
e) Chanakya shall ensure proper and timely handling of complaints from clients and take appropriate action immediately.

All requests, queries and complaints received from investors, directly or indirectly, for Chanakya, under any license and in any capacity in which it is rendering the services.

3. WHAT SHALL CONSTITUTE A COMPLAINT

a. Definition of Complaint

Complaint' has not been defined by IFSCA and therefore the definition of Complaint as provided under Consumer Protection Act (COPRA), 2019 has been referred, the relevant extract of which is reproduced below:

"Complaint means any allegation in writing* made by a complainant that - an unfair trade practice or a restrictive trade practice has been adopted by any trader or service provider; the services hired or availed off or agreed to be hired or availed off by him suffer from deficiency in any respect.

'Deficiency' means any fault, imperfection, shortcomings or inadequacy in the quality, nature and manner of performance which is required to be maintained by or under any law for the time being in force of has been undertaken to be performed by a person in pursuance of a contract or otherwise in relation to any service."

*Although definition indicates that complaints have to be in writing but given the business model of Chanakya, it can also be submitted via call centre or in person at various POS (Point of Sale).

b. **Source, mode & ownership of complaints**

The investors/ clients can lodge complaints via Call, Letter, Fax, SMS, Email, Walk-in, Website, or any other mode as may be prescribed from time to time.

All complaints received by way of letters and e-mails should bear the date stamp as minimum standard; time stamping is optional.

For complaints received through call/walk-in, details of the same needs to be captured immediately so as to capture accurate date & time of receipt of complaint.

4. **Procedure of Identifying, Counting & Reporting**

a. **Identifying Complaint**

At the time of receipt of the communication, any communication may be treated as a "Query" or "GRIEVANCE" and on verification, if the service was found to have not been delivered as per the standard prescribed, the same needs to be converted as a "complaint". The quality of service shall also be considered for treating the communication as complaint.

Non-adherence of the stipulated service standard / applicable IFSCA guidelines and any other applicable law shall be considered as a lapse in service. Some parameters leading to a lapse in service are:

- Delay - exceeding turn-around time (TAT) / applicable IFSCA guidelines and any other applicable laws, whichever is lower;
- Accuracy - wrong/error in processing/incorrect information/misguidance/mis-selling;
- Completeness - incomplete/inadequate service;
- Deviation in any defined aspect / applicable IFSCA guidelines and any other applicable law - service / investment related or otherwise;
- Behaviour of service personnel - impolite/misbehaviour;
- Any other action that is not acceptable/in line with general service standard.

Allegation on any of the above parameters needs to be proved before categorizing the same as complaint. Mere statement of the investor/client on above grounds is not acceptable. On investigation, lapse on any of the above grounds needs to be proved/ ascertained by Chanakya/ IFSCA. If such lapse is attributable to any act of commission or omission by Chanakya/ Registrar and Transfer Agent (RTA), the same shall be treated as a complaint. If such lapse is attributable to any act of commission or omission by Chanakya but due to investor/any external party, the same shall be treated as grievance.

b. **Procedure at RTA's**

RTA shall devise a mechanism of segregating request, query, grievance and complaint while capturing an interaction in the system; Interaction date is also captured from the stamp of receipt. RTA is advised to ensure that all reporting is based on the investor complaints of the investors rather than grievance of the investor. Compliance Officer shall ensure that the final number of complaints are reported consistently across in all reporting requirements under law, if any.

5. **Maintenance of records**

The complaint register in the form of an electronic data shall be archived on regular interval as may be deemed necessary which can at any time be retrieved for accessing any data. Further, complaints received in hard copy shall be appropriately filed and database of the same shall be maintained.

6. **Tracking of pending / unresolved complaint**

Internal TAT shall be strictly adhered to. Generally, investors/ clients shall be responded within prescribed TAT, but reply may be delayed on account of various reasons. Some of the reasons are mentioned below:

(i) Incomplete complaint
(ii) Investor is not available for understanding/discussion of complaint
(iii) Retrieval of data such as welcome letters, PODs, voice recordings, SMS / Elogs, takes time in case alleged period of complainant is old or a very large period such as more than a year.
(iv) Analysis/investigation of case take long time if the alleged period of Investor is old or a very large period such as more than a year

In spite of above limitations, Chanakya shall put their best efforts to resolve the complaints to the satisfaction of the Investor within appropriate time. If the investors are not satisfied with the response received from the Chanakya, investors/ clients may also approach IFSCA for redressal of their complaint.

7. **Closure of complaint**

Whenever the reply is sent to the investor / client and the investor / client do not revert back in 30 days from the date of reply, the final reply date shall be treated as close date. If the investor / client reverts back after 30 days from the date of final reply, not accepting the resolution, then the said complaint shall be treated as a new complaint. Hence, in the said process, the actual resolution may cross 30 days on account of such to and fro communication with the investor. Further, if the investor raises another complaint having different issue anytime then the said complaint shall be treated as a new complaint.

8. **Investor Awareness**

An email-id will be designated exclusively for reporting / raising complaints / queries relating to Chanakya and shall be communicated appropriately to the investors / clients from time to time.

9. **Management Information Report & Audits**

RTA shall inform Chanakya about the number of complaints received, pending together with ageing analysis, nature of complaints that have risen sharply as against their

previous month, number, area and/or locations that resulted into rise of complaints etc. Also, any improvement done or area of lacunae identified may be included in the MIS. Periodic MIS for complaints crossing TAT shall be shared with the Compliance Officer. Based on the analysis of the MIS, necessary action may be initiated against the concerned party.

10. **Policy Updation And Periodical Review**

Where any material change to the policy is warranted due to regulatory changes or business expediency reasons, the same may be carried out with the approval of the Compliance Officer and referred to the Board of Chanakya at the earliest thereafter, for ratification. The policy shall be reviewed by the Board of Chanakya on such periodicity as may be deemed fit by them.

11. **Effective Date**

This policy will be effective from 1 January 2025.

IMPORTANT INFORMATION

If at any point a conflict of interpretation/ information between this Policy and any Regulations, Rules, Guidelines, Notifications, Clarifications, Circulars, Master Circulars applicable to Chanakya issued by the International Financial Services Centres Authority (IFSCA) (or any other regulator applicable then to Chanakya) arise, then interpretation of such Regulations, Rules, Guidelines, Notification, Clarifications, Circulars, Master circulars issued by IFSCA or such other regulator shall prevail over this Policy.