Altus Fund Management
IFSC Pvt Ltd

COMPLAINT HANDLING AND GRIEVANCE REDRESSAL POLICY

Document Initiated By:	Juhi Chaturvedi (Compliance Officer)
Document Approved By:	Board Members in Board meeting held on 25th March, 2025

Introduction:

The International Financial Services Centres Authority (IFSCA), through its circular F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 02, 2024, has emphasized the importance of protecting the interests of financial consumers in the IFSC. It mandates all regulated entities to establish a robust framework for handling complaints and resolving grievances in a fair, transparent, and efficient manner.

In compliance with the aforementioned regulatory guidelines, this policy outlines the framework for receiving, handling, and resolving client complaints and grievances, while fostering transparency, accountability, and consumer satisfaction.

Core Principles:

1. **Confidentiality** – All complaints will be treated with strict confidentiality. Any personal or sensitive details provided during the grievance resolution process will be safeguarded.
2. **Fairness** – Complaints will be addressed impartially and without bias. Our resolution process is designed to be equitable and efficient, ensuring fair treatment for all investors.
3. **Regulatory Compliance** – The Company abides by all applicable legal and regulatory requirements set by the International Financial Services Centres Authority (IFSCA) and other governing bodies.
4. **Transparency** – We maintain open communication throughout the complaint resolution process, providing timely updates to investors on the status of their grievances.

Definitions:

- **Consumer** – As per Clause 1.3.11 of the IFSCA (Anti-Money Laundering, Counter-Terrorist Financing, and Know Your Customer) Guidelines, 2022.
- **Complaint Redressal Appellate Officer (CRAO)** – A senior official responsible for reviewing appeals related to decisions made by the CRO.
- **Complaint Redressal Officer (CRO)** – The designated employee managing complaints submitted by customers.
- "**Regulated Entity"** shall have the same meaning as assigned to it under clause 1.3.35 of the IFSCA (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines, 2022
- **Complaints** – Consumer concerns arising from service-related issues, including but not limited to:
  - Account onboarding
  - Transaction-related matters
  - Process inefficiencies
  - Charges and fees
  - Settlement disputes
  - Status updates on pending issues

Key Contact Persons

- **<u>Complaint Redressal Officer (CRO):</u>**
  Name: Juhi Chaturvedi
  Contact Number: 9537905780
  Email: Juhi@altusifsc.com

- **<u>Complaint Redressal Appellate Officer (CRAO):</u>**
  Name: Pradip Patel
  Contact Number: 7490975693
  Email: Pradip@altusifsc.com

<u>Methods for Submitting Complaints</u>: Consumers can register complaints through the following channels:

- **Email** – Complaints may be sent via email to the designated Complaint Redressal Officer (CRO), whose contact information is available on our official website.
- **Postal Mail** – Written complaints can be mailed to our registered office at:

  Complaint Redressal Officer (CRO)
  Unit No. 403A, 4th Floor, Signature Building, 13-B, Zone-1, Gift SEZ, Gift City, Gandhinagar, Gujarat, India, 382355.

- **Direct Feedback** – Consumers can provide feedback directly to company representatives during interactions.

All grievances should initially be directed to the CRO through any of the above means.

<u>Complaint Resolution Process:</u>

1. Upon receiving a complaint, the CRO will evaluate its validity.
2. If the complaint is accepted, the complainant will receive written confirmation within 3 working days from the receipt of the complaint.
3. If a complaint is not accepted, the complainant will be informed within 5 working days, providing the reasons for non acceptance.
4. The complaint will be processed impartially, with additional information requested if necessary.
5. The Company aims to resolve complaints within 15 days but no later than 30 days from acceptance.
6. If a complaint is rejected, a written explanation will be provided.

Appeal Process:

- If a complainant is dissatisfied with the resolution, they may appeal to the CRAO within 21 days of receiving the CRO's decision.
- The CRAO will review and address the appeal within 30 days.

Escalation to Regulatory Authority:

- If the complainant remains unsatisfied after exhausting the internal grievance process, they may escalate the issue to the relevant authority by emailing **grievance-redressal@ifsca.gov.in** within 21 days of receiving the final decision.

Reporting & Monitoring:

- The Company will submit reports on complaint resolution to the relevant authorities as required.
- An annual report will document the number of complaints received, resolved, rejected, and pending.

Record Maintenance: The Company will maintain records of all complaints, including:

- Complaint details and status updates
- Correspondence with the complainant
- Supporting documents used in decision-making
- Resolutions provided or reasons for rejection
- Timelines for complaint resolution

Records will be preserved electronically in compliance with legal requirements. In case of ongoing litigation, records will be retained until the matter is fully resolved.

Future Developments: Currently, complaints are processed manually, with records maintained in Word and Excel formats. The Company may introduce an online complaint management system in the future based on operational requirements.

Compliance Oversight: The Compliance Officer will oversee the grievance redressal mechanism to ensure adherence to IFSCA regulations. Regular internal audits will be conducted to maintain compliance.

This policy may be revised as needed to align with internal evaluations or regulatory updates.

List of matters not considered as "Complaint"

1. Anonymous complaints (except whistleblower complaints).
2. Incomplete or un-specific complaints.
3. Allegations without supporting documents.
4. Suggestions or seeking guidance/explanation.
5. Claim for notional loss, opportunity loss for the disputed period or trade