

### INVESTOR GRIEVANCE POLICY

# **INTRODUCTION:**

Oman India Joint Investment Fund-Management Company Private Limited ("**Company**") functions as the investment manager for Alternative Investment Funds duly registered with SEBI ("**Funds**").

The Grievance Redressal policy outlines the grievance handling process through a structured grievance redressal framework. Keeping in view the regulatory requirements under SEBI AIF Regulation 24A and 25, SEBI Circular SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated 20 September 2023, and investor protection, OIJIF has established principles and framework to handle both queries and grievances of the investors of the funds managed by the Company ("**Investors**") to ensure that:

a. all Investors are treated in a fair and equitable manner.

b. complaints raised by Investors are dealt in a timebound manner.

c. investors are provided with information on how to raise their issues and complaints and escalate if they are not satisfied with the resolution or handling.

d. an investor relations professional or a member of the finance team ("**Investor Relations Professional**") may be entrusted with ensuring timely and effective communication with the Investors.

The Company recognizes that the swift and effective resolution of inquiries and issues is a fundamental component of preserving our existing investor relationships. This is especially significant given Company's role as the investment managers for various Funds. The Company views Investor inquiries and complaints as valuable feedback, and this policy outlines the structured process the Company has in place to address grievances. The Company approaches this responsibility with a constructive attitude, striving to offer alternative solutions when necessary. Our goal is to foster strong and positive relationships with our Investors.

### **EFFECTIVE DATE**

This Policy will be effective from the date it receives approval from the Board of the Company and may be amended from time to time.

### REVIEW

This Policy will be reviewed by the Board of the Company at least annually.



### FRAMEWORK:

### A) Company's Investor Relations Team:

Investors are entitled to make a complaint in writing directly to the Company. Investors that are serviced by their independent advisors or distributors can also raise their complaints through their advisors and distributors by proving the authority letter or such other proof of representation.

1. It is mandatory for the Investor having grievance to take up the matter directly with the Company in the first place.

2. The Investors can directly reach the Company through email at <a href="https://www.shrift.com">shrikant@oijif.com</a>

3. Investors can contact the Company through telephone on +91 (22) 66667101

4. Investors can send letters to the Company at:

604/605/606, Lodha Supremus, Opposite Kamala Mills /World Tower, Senapati Bapat Marg, Lower Parel (W), Mumbai-400013, Maharashtra.

### **Time Frame:**

All queries/complaints received by Investor Relations Professional will be responded/resolved promptly and within the timelines set out by SEBI.

### **B)** Registering on SEBI's SCORES Portal:

Investors also have the option to submit their grievances by registering on SEBI's SCORES platform, accessible at <u>www.scores.gov.in</u>. SCORES is an online portal established by SEBI to facilitate grievance resolution. If Investors are not satisfied with the response from the Company, they can lodge their grievances with SEBI at <u>https://scores.gov.in/scores/Welcome.html</u> or may also write to any of the offices of SEBI or contact SEBI Office on Toll Free Helpline at 1800 266 7575 / 1800 22 7575.

The complaint shall be lodged on SCORES within 1 (one) year from the date of cause of action, or from the date the complainant has approached the Company, for redressal of the complaint and

- the Company has rejected the complaint or,
- The complainant has not received any communication from the Company or,
- The complainant is not satisfied with the reply received or the redressal action taken by the Company.



SCORES may be accessed through SCORES mobile application as well, same can be downloaded from below link:

https://play.google.com/store/apps/details?id=com.ionicframework.sebi236330 https://apps.apple.com/in/app/sebiscores/id1493257302.

If the investor is not satisfied with the extent of redressal of grievance by the Company, there is a one-time option for 'review' of the extent of the redressal, which can be exercised within 15 days from the date of closure of the complaint on SCORES. Thereafter, the complaint shall be escalated to the supervising official of the dealing officer of SEBI.

# C) Opting for Online Dispute Resolution:

After exhausting all aforementioned options for resolution, if the client is not satisfied, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at <a href="https://smartodr.in/login">https://smartodr.in/login</a>. As per the SEBI circular no. SEBI/HO/OIAE/OIAE\_IAD-1/P/CIR/2023/131 dated July 31, 2023, titled "Online Resolution of Disputes in the Indian Securities Market", as amended from time to time, an ODR process can now be invoked by the investor against fund managers and be resolved through online conciliation and/or online arbitration as specified under the circular.

### **D)** Arbitration

All claims, differences or disputes between investors and the fund or the Investment Manager arising out of or in relation to the activities of the fund or the Investment Manager in the securities market shall be submitted to a dispute resolution mechanism that includes mediation and/or conciliation and/or arbitration, in accordance with the procedure specified by SEBI. The procedure for resolution of disputes between the investors, fund and the Sponsors/ Investment Manager shall be through arbitration or any such mechanism as set out in the respective Fund documents.

# INTERNAL MACHINERY TO HANDLE INVESTOR COMPLAINTS

Complaints need to be looked into efficiently and in fair manner. If some policy related issues come up during the resolution of the complaints, the same must be escalated at higher level and discussed at length.

Queries and complaints are subject to investigation within specified timeframes at various levels of escalation. Specific categories of queries or complaints, such as those related to fraud, legal matters, and involving third parties, may require extended investigation times. In such cases, the company acknowledges these situations and communicates the expected turnaround time to the investor. Ensuring the timely and clear communication of the company's stance on any issue is of utmost importance and is done in a manner that is investor-friendly.

Efforts will be made to train staff for handling complaints. Staff members will be sensitized on customer grievance matters so that they in turn, handle customers' complaints effectively and win their confidence. The compliance officer/investor relations officer will ensure that internal machinery for handling complaints/grievances operates smoothly and efficiently at all levels.



## MAINTENANCE OF DATA AND DISCLOSURES

The Company shall maintain all the necessary details and information regarding investor complaints and their redressal / resolution.

The information shall be maintained and compiled in following format by the Company within 7 days from the end of the quarter:

S. No.	Investor Complaints received from	Pending as at the end of the last quarter	Received	Resolved	Total pending at the end of the quarter	Pending complaints > 3 months	Average Resolution time (in days)*
1.	Directly from Investor						
2.	SEBI (SCORES)						
3.	Other sources (if any)						
	Total						

#### 1. Investor complaints data for the quarter ending (March/June/September/December)

\* Average Resolution time is the sum total of time taken to resolve each complaint in days in the current quarter divided by total number of complaints resolved in the current quarter

### 2. Investor complaints data for last three Financial Years (FY)

S. No.	FY	Carried forward from pervious PY	Received	Resolved	Pending at the end of PY
1.					
2.					
3.					
	Total				

Data maintained shall be disclosed for new schemes, as a separate chapter in the PPM of new schemes managed by the Company and in case of updating of the PPM of an existing scheme.