

**ANGEL ONE INVESTMENT MANAGERS & ADVISORS PRIVATE  
LIMITED (IFSC BRANCH)**

**INVESTOR GRIEVANCE REDRESSAL POLICY**

## Version History

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## **I. BACKGROUND**

Angel One Investment Managers & Advisors Private Limited (IFSC Branch) (hereinafter referred to as 'AOIMAPL' / 'FME') is registered with the International Financial Services Centres Authority ('IFSCA') to operate as a Fund Management Entity ('FME') under the Restricted Non-retail Category in accordance with the IFSCA (Fund Management) Regulations, 2025 ('FME Regulations') as amended from time to time.

The AOIMAPL is the Fund Manager of the Ionic Global Innovation Fund, category III Alternative Investment Fund (hereinafter referred to as 'Fund') as per the FME Regulations. The FME believes that service to the contributors 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.

Grievances include allegations such as failure to disclose conflicts of interest, misrepresentations, etc. and Complaints regarding processing of drawdown transactions, discriminatory treatment among various classes of unit holder, distribution of units etc. Investor feedbacks, queries/clarifications will not be considered as instances of Complaint or Grievance.

## **II. OBJECTIVES OF THE POLICY**

The FME/Fund will endeavour to address client Complaint/Grievance in a swift and effective manner within a reasonable time period from the date the receipt of Grievance. Additionally, efforts will be made to prevent arising of similar Grievances in the future.

The FME/Fund will ensure that the policy is geared towards achieving the below mentioned objectives:

- Contributors are treated fairly, reasonably, and justly;
- Contributor confidentiality and privacy is maintained;

## **III. IFSCA REQUIREMENTS**

As per the FME Regulations and IFSCA circulars issued from time to time, the Complaint Redressal Officer (CRO)/Complaint Redressal Appellate Officer (CRAO) as appointed/designated by the FME shall seek to attend and address any investor query/concern/Grievance immediately.

The compliance officer of a the FME shall ensure that handling and disposal of Complaints/Grievance by the FME is in accordance with the regulatory requirements specified by IFSCA from time to time.

The FME shall ensure that this official is vested with the necessary authority and independence to handle Complaints received from the Investors.

Further to this, the Principal Officer of the Fund shall periodically review the investor Complaints received and shall ensure prevention of similar occurrence in future.

#### IV. GRIEVANCE REDRESSAL MECHANISM

Complaints/Grievances – Meaning:

Complaints/Grievance means receipt of any written or electronic communication, excluding those specified in **Annexure – I**, from an investor or any aggrieved party expressing dissatisfaction with the services, conduct, obligations, or policies of the AIF, Fund Manager, Trustee, or any associated entity, requiring remedial action or resolution.

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

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 FME/Fund's stand on any issue is important and be clearly informed to the investor in friendly manner.

##### **Step 1: Registration and Acknowledgement of Complaint/Grievance**

- Investors can contact Ms. Khushboo Thakker ("CRO/ Compliance Officer ") for any queries and Complaints.
- A Complaint can be registered by the Investor by contacting the Compliance Officer via email or letter as mentioned below:
  - Email: [giftgrievance@ionic.in](mailto:giftgrievance@ionic.in)
- Office address – **Unit no. 163, Seat 1-3, Ground Floor, Pragma Accelerator II, Building 15B, Block 15, Road No. 1C, Zone 1, GIFT SEZ, GIFT City, Gandhinagar- 382355**
- Any Complaints received will be directed and acknowledged by the CRO. The CRO shall share the acknowledgement via email or written notice with the investor raising such Compliant/Grievance within 3 working days of receipt of such Complaint as a confirmation for such registration. This acknowledgement reference number will also help in tracking the progress/ status of the Compliant/Grievance.
- In case of non-acceptance of any compliant/grievance, the same shall be informed to investor along with the reason within 5 working days from the date of receipt of compliant.
- The CRO will strive to address all Complaints and provide redressal within 15 days.
- 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

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Compliant/Grievance is being addressed, it can be escalated to the Mr. Nilesh Kalsariya-CRAO within 21 days of receipt of decision of CRO through:

- Email: [Nilesh.kalsariya@ionic.in](mailto:Nilesh.kalsariya@ionic.in)
- Office address - **Unit no. 163, Seat 1-3, Ground Floor, Pragma Accelerator 2, Building 15B, Block 15, Road No. 1C, Zone 1, GIFT SEZ, GIFT City, Gandhinagar-382355**

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')**

If the investor is not satisfied with the resolution or the manner in which Compliant/Grievance is being addressed by FME, then he/she may also escalate the issue to the International Financial Services Centre Authority via email [grievance-redressal@ifsca.gov.in](mailto:grievance-redressal@ifsca.gov.in) preferably within 21 days from the receipt of the decision from the CRO/CRAO.

**V. DISPUTE RESOLUTION MECHANISM**

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

**VI. 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 as detailed in **Annexure II** will be maintained by the Fund at least for six years or for such other period as may be notified by the IFSCA time to time.

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.

**VII. 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.

**VIII. REVIEW OF POLICY**

The Policy will be reviewed on 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 Designated Partners/Board of Directors.

**Annexure I**

- 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 FME
- Complaints about any unregistered/ un-regulated activity
- References in the nature of seeking information or clarifications about financial products or services

**Annexure II**

**Records of Complaints/Grievances**

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