EAAA India Alternatives Limited

(Formerly known as Edelweiss Alternative Asset Advisors Limited)

Investor Grievances Redressal Policy

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Policy Owner	Investor Servicing & Compliance

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INVESTORS GRIEVANCES REDRESSAL POLICY

1. Title

This Policy shall be called 'Investor Grievance Redressal Policy'.

2. Preamble

EAAA acts as the Investment Manager **("IM")** for various Securities and Exchange Board of India ("SEBI") Alternatives Investment Funds and /or their schemes (hereinafter singly referred to as the **"AIF"** and collectively as the **"AIFs")**. These AIFs are governed by the SEBI AIF Regulations as well as their respective Fund Documents (i.e. Private Placement Memorandum, Indenture of Trust, Contribution Agreement and Investment Management Agreement). These AIFs raise funds from the investors (hereinafter referred to as the **"Investor(s)"** or **"Customers"** or **"Client(s)"**) in various segments including institutions, corporates, business houses, family offices and high networth individuals **("HNIs").** As per the SEBI Regulations and the Fund Documents, EAAA as the IM to these AIFs, is primarily responsible for client servicing including maintaining account of their beneficial holding, making periodic reports and providing clarifications from time to time. EAAA, as the IM of AIFs, also appoints one or more agencies as the Registrar to the AIF **("R & T") or Fund Accountants,** which shall be responsible for client servicing along with EAAA.

3. Philosophy

Being part of the Edelweiss Group, EAAA believes that providing prompt and efficient service to the client is essential not only to attract new investors, but also to retain the existing ones. This policy aims at minimizing the instances of Investor complaints/ grievances through a framework of proper service delivery and review mechanism as well as to ensure prompt redressal of investor complaints/ grievances. The review mechanism is particularly important as it will help in identifying shortcomings in product features and service delivery to make further improvements.

Further, in line with SEBI Circular No. SEBI/HO/ITD-1/ITD_VIAP/P/CIR/2025/111 dated July 31, 2025 and other applicable laws, rules and regulations and any other amendments made in this regard and certain measures to be assessed and implemented by July 31, 2026. The Company is committed to ensuring digital accessibility and inclusive grievance redressal for Persons with Disabilities (PwDs). The grievance redressal framework shall be accessible, equitable and non-discriminatory for all investors, including PwDs.

4. Objective

a. This Policy is formulated to provide efficient services to the investors and to effectively address and redress the grievances of the investors in a timely manner.
b. The coverage of this policy is to redress the grievance of all the AIF investors of the Company.
c. The Company has appointed M/s. Computer Age Management Services Limited and M/s. KFIN Technologies Private Limited as its Registrar & Transfer Agents ("RTA"), for respective AIFs, to ensure faster and efficient provision of services to the investors. The RTA is primarily responsible for handling the investor related affairs of the Company.

5. Guiding Principles

This Policy on Grievance Redressal is based on the under noted guiding principles:

- The Investors will always be treated fairly;
- Complaints raised by any Investors will be dealt in timely manner and with due courtesy;
- Investors will be fully informed of avenues to escalate their complaints/grievances within the organization / R&T/ Fund Accountant;
- EAAA and/ or R&T or Fund Accountant will deal with all complaints efficiently and fairly being deeply cognizant of the fact that the smallest of complaints can damage the institution's reputation and standing, if not attended properly; and
- All the employees of EAAA/ R&T or Fund Accountant will work in good faith and without prejudice to the interests of the Investor(s).
- Investors who are PwDs shall be provided accessible and inclusive modes of grievance lodging, communication, escalation and resolution, without discrimination and with reasonable accommodation in terms of regulatory guidance and best practices.

6. Investor Service Timelines

All investor communication or grievances in relation to investor matters shall be addressed by the Company and/ or the RTA, as the case may be, within 5 working days from the date of receipt of such grievance or communication. Depending on the nature of the query/ complaint, certain responses may take additional time, in which case the Company/ the RTA (as the case may be) will keep the recipient informed of the same.

In case the Company and/ or RTA requires any additional information or supporting document to address such grievance or communication, the return communication stating details of desired information or document should be released within respective Turnaround Time. Upon receipt of requested information or document, the Company/ the RTA should address such grievance or communication within respective Turnaround Time.

Multiple correspondence/ communications or reminders received for the same matter within the stipulated turnaround time under this Policy for handling of the query/ communication will be treated as one complaint.

If a query is resolved after the stipulated turnaround time and there is no reminder from the investor during such time period, such query will not be treated as complaint.

For investors who are PwDs, the Company and/or RTA shall provide reasonable accommodation, including assisted communication, alternate formats of communication and human-assisted grievance handling wherever required.

7. Redressal Mechanism

In order to make redressal mechanism more meaningful and effective, a structured system will function at EAAA, which will ensure that redressal sought is just and fair and done in a timely manner.

The Internal Mechanism to be followed by EAAA to handle Investor complaints/ grievances will be as follows:

a. EAAA will make known to the Investors all relevant mediums to raise an issue:

   - Where to make the complaint
   - When to expect a reply
   - Whom to approach for redressal

b. The offer document of each of the AIFs shall contain the contact details of the person to seek clarifications. Additionally, updated contact details of the Company are provided in the Annexure to this policy and Fund wise contact details will be placed on the website of the Company for easy access by the investors. These details will be updated regularly by the Investor Relations team on the website.

c. The Investor shall have the flexibility to raise the issue(s) via any of the possible mode i.e. personal discussion, phone, email or written letters, including accessible digital channels designed to support PwDs, such as screen-reader compatible emails, accessible website forms and assisted telephonic support.

d. The Investors can raise their complaints either directly to EAAA or to RTA by giving details of their name, folio no., name of the fund invested in, nature and full particulars of their complaint. Where additional information/ documents are required, EAAA/ RTA shall seek the same from the investor for appropriate redressal of the grievance/ complaints.

e. EAAA has a dedicated Investor Servicing Team who is responsible for timely and prompt communication with Investors and distributors. Investors can write to EAAA for any queries/ complaint/ clarifications that they may have - please refer to the website of EAAA for contact details of EAAA and RTA, as applicable.

f. After examining the matter, EAAA/ R&T will endeavor to send a response as early as possible but in any event, not later than 21 calendar days from receipt of the complaint.

   In case the resolution is expected to take longer time period, then an intermediate response shall be made to the Investor intimating the expected turnaround timeline of the resolution.

g. All grievance resolutions shall be undertaken as per the AIF regulations and within the framework of the Fund documents of the respective AIFs.

h. Accessibility-related grievances can be escalated, if required, to Chief Technology Officer and Chief Information Security Officer (appointed as Designated Nodal Officer) for timely redressal of the grievance and the contact details will be provided on the website of EAAA.

8. Redressal mechanism through SEBI SCORES

The investor may approach the SEBI and file their grievance through “SCORES”, the centralized online system for lodging and tracking complaints, in case they are not satisfied with the response provided by

EAAA. SCORES facility can be accessed through the web link https://scores.sebi.gov.in/. Any investor facing accessibility related issues on digital platforms of the Company can also lodge accessibility related complaint on SCORES under the category related to "Accessibility".

Filing complaints on SCORES - Easy & quick
a) Register on SCORES portal
b) Mandatory details for filing complaints on SCORES are name, PAN, address, mobile number, E-mail ID of the complainant.

EAAA will redress the grievance within 21 days of receipt of the grievance through SCORES or any other timeline as stipulated by SEBI.

EAAA recommends to the investors to follow the grievance redressal stated above through the Company/ RTA before opting to raise grievance/ complaint directly with SEBI through SCORES.

9. Online Resolution of Disputes through SMART ODR Portal

An investor shall first take up his/her/their grievance with the Company by lodging a complaint directly with EAAA as mentioned above. If the grievance is not redressed satisfactorily, the investor may, in accordance with point 8 above, escalate the issue through the SCORES Portal. After exhausting these options for resolution of the grievance, if the investor is still not satisfied with the outcome, he/she/they can initiate dispute resolution through the Online Dispute Resolution Mechanism ("ODR") offered by SEBI through the Smart ODR Portal on website https://smartodr.in/login

Alternatively, the investor can initiate dispute resolution through the ODR Portal if the grievance lodged is not satisfactorily resolved or at any stage of the subsequent escalations as mentioned in above points (prior to or at the end of such escalation/s).

The dispute resolution through the ODR portal in accordance with the Circular(s) issued by the SEBI in this regard from time to time.

10. Functional responsibility & updates

a. Resolution of an investor complaint will be a collective responsibility of all the teams including investor servicing, investment, operations, product, marketing, compliance and legal based on the nature of the complaints and inputs required for closure. The Investor Servicing team shall act as the interface to handle all the client requests/ complaints and shall undertake the closure of a complaints subject to other teams providing necessary information/ inputs for redressal.

b. The complaints raised with SEBI or with any other regulator shall be dealt under the supervision of the Compliance Team.

c. Complaints turned into dispute/ litigation shall be handled by the Legal team.

d. EAAA shall have a designated Investor Servicing Team, who shall be responsible for handling the overall client servicing function.

e. A report summarizing the (a) number of complaints; (b) Nature of complaints; (c) time taken for resolution; (d) delay in response, if any; (e) complaints pending beyond 21 days (with reasons) (f) complaints turned in to litigation/ dispute shall be prepared by the marketing/ customer relations team to the Business Head and the Compliance Officer of EAAA. This shall be placed on a quarterly basis in the Board meeting.

11. Amendment/ waiver/ exceptions

This policy shall be reviewed periodically and the requisite updates, if any, shall be made. Any deviation/ waiver/ exception to the provisions of this policy shall be made only after discussion with the Compliance Team and with the approval of the Business Head of EAAA ,post this, it shall be placed for approval by the Board of Directors. Further, the Annexure pertaining to contact details may be updated from time to time by the internal teams.

In case of any regulatory change(s) between two review cycles/ amendment, this Policy shall be deemed as amended in accordance with the changed regulations/circulars. In other words, in case of conflict between applicable regulations and Policy, the applicable regulations shall prevail at all times.

ANNEXURE – Contact Details

Contact Details of EAAA India Alternatives Limited (formerly known as Edelweiss Alternative Asset Advisors Limited)

Name: EAAA India Alternatives Limited (EAAA)
Address: Edelweiss House, 3rd Floor, Off CST Road, Kalina, Mumbai-400098
Phone No: +91 (22) 4009 4400 (investors can call this number on any business day between 10.00 am - 6.00 pm to register their queries/ complaints)
Email id for sending all queries and complaints eaaa.customerservice@eaaa.in
Website - https://www.eaaa.in/

Nodal Officer for accessibility related grievances of PwDs–
Mr. Killol Thakore- Killol.Thakore@eaaa.in
Phone- +91 (22) 4019 4821

Contact Details of RTA

a. **KFIN Technologies Private Limited (Kfintech) -** Karvy Selenium Tower B, Plot No.: 31 & 32, Gachibowli, Financial District, Nanakramguda, Serilingampally, Hyderabad – 500 032, Telangana

b. **Computer Age Management Services Limited (CAMS)** - No. 158, Rayala Towers, Tower - I, I MEZ Floor, Anna Salai, Chennai – 600002
Phone No: 044 61092347

Please refer to EAAA's website for the contact details of Fund-wise email ids at https://www.eaaa.in/