



Alpha Alternatives Fund Advisors LLP (IFSC Branch)

Compliant Handling and Grievance Redressal Policy

Alpha Alternatives Fund Advisors LLP

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1. Objective

This policy outlines the framework for effective complaint handling and grievance redressal of investor by the Fund Management Entity (FME)/ Investment Manager operating in the International Financial Services Centre (IFSC) and ensure a transparent, fair, and timely resolution of complaints and grievances.

2. Applicability

This policy is applicable to IFSCA Regulated Entity i.e Alpha Alternatives Fund Advisors LLP (“LLP”) (IFSC Branch), Fund Management Entity / Investment Manager.

3. Definition of a Complaint/ Concern (and exclusions therefrom):

“Complaint” means Any expression or representation in writing or through other modes by the investor / client, alleging deficiency in service, product or conduct of the regulated entity or Investment Manager and seeking relief thereon.

An indicative list of matters not considered as ‘complaint’ has been mentioned as under;

- a. Anonymous complaints (except whistleblower complaints)
- b. Incomplete or un-specific complaints
- c. Allegations without supporting documents
- d. Suggestions or seeking guidance/explanation
- e. Complaints on matters not relating to the financial products or services provided by the Regulated Entity
- f. Complaints about any unregistered/ un-regulated activity
- g. References in the nature of seeking information or clarifications about financial products or service

4. Appointment of Designated Person

4.1. The LLP (FME) shall designate one of its personnel (i.e Compliance Officer & Risk Manager of IFSCA Branch) as the **Compliant Redressal Officer (CRO)** who shall seek to attend and address any Investor complain / grievance /query/concern/ at the earliest as per the said policy.

The compliance officer shall ensure that handling and disposal of complaints are in accordance with the regulatory requirements specified by IFSCA

4.2. The LLP shall designate one of its senior level personnel as the **Compliant Redressal Appellate Officer (CRAO)** who shall be responsible for handling appeals of Investor against the decision taken by the Complaint Redressal Officer.

4.3. The LLP will ensure that CRO and CRAO are vested with the necessary authority and independence to handle complaints received from the Investors.

5. Complaint Handling Procedure

5.1. Submission of Complaint:

- Complaints may be submitted through various channels, including email, online portals, telephone, or physical submission at the office.
- The complaint must include the complainant's name, contact information, description of the issue, and supporting documents.

5.2. Acknowledgment:

- Each complaint shall be acknowledged within **Three working days** of receipt through email.
- In case of non-acceptance, the Regulated Entity shall inform the complainant within 5 working days along with reasons.

5.3. Assessment and Resolution:

- The CRO will classify complaints based on severity and urgency.
- Complaints should generally be resolved within **15 working days**. For complex issues requiring more time, the complainant will be informed of the extended timeline and the maximum time limit to dispose the complaint is 30 days from the acceptance of complaint.

5.4. Communication of Outcome:

- The resolution details will be communicated to the complainant in writing, including reasons for decisions made.

6. Appeal Mechanism

If a complainant is not satisfied with the resolution provided by the Regulated Entity or if the complaint has been rejected by the Regulated Entity, the complainant may file an appeal before the CRAO of the Regulated Entity preferably within 21 days from the receipt of the decision from the CRO.

6.1. Filing an Appeal:

- If the complainant is dissatisfied with the resolution, they may file an appeal with the CRAO within **21 days** of receiving the outcome.

6.2. Review by CRAO:

- The CRAO will independently review the complaint and resolution to be provided.
- Appeals should be resolved within **30 working days** of receipt.

6.3. Communication:

- The CRAO will provide a detailed response to the appellant, including further steps available if they remain dissatisfied.

7. Complaint before the Authority

Where a complainant is not satisfied with the decision of the Regulated Entity and has exhausted the appellate mechanism of the Regulated Entity, he may file a complaint before

the Authority through email to grievance-redressal@ifsca.gov.in preferably within 21 days from the receipt of the decision from the Regulated Entity:

8. Maintenance of records Disclosure of policy and the name contact details of CRO and CRAO on website of the entity.

The policy on Complaint Handling and Grievance Redressal shall be prominently disclosed on the website of the Regulated Entity or on a dedicated webpage of its Group Entity, as applicable, under the heading “Complaint Handling and Grievance Redressal”. The name and contact details of the Complaint Redressal Officer and the Complaint Redressal Appellate Officer shall also be prominently displayed under this section.

9. Maintenance of records

All records relating to handling of complaints, including the following:

- i. Complaints received and processed;
- ii. All correspondence exchanged between the Regulated Entity and the complainants;
- iii. All information and documents examined and relied upon by the Regulated Entity 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

Shall be maintained in electronic retrieval form for the same period as mandated by the Authority under the relevant and applicable regulations and circulars, andbooks, guidelines thereunder:

Provided that in case there is no specific mention of such time period, the record shall be maintained for at least six years from the date of disposal of complaint:

Provided further that 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.

10. Reporting

- a) The details / reports on handling of complaints shall be filled in the form and manner specified by the Authority from time to time.
- b) The details with respect to complaint handling and grievance redressal will be the part of Annual Report to be submitted to IFSCA under the applicable laws.

The details of all complaints received, resolved, rejected and pending during the year will be provided in a tabular/ graphical format under the specific section with heading “Complaint Handling and Grievance Redressal” in Annual Report.

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