



Alpha Alternatives Fund Advisors LLP (IFSC Branch)

Complaint Handling and Grievance Redressal Policy

Alpha Alternatives Fund Advisors LLP

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A. PREAMBLE

The International Financial Services Centres Authority (Fund Management) Regulations, 2022, as amended or supplemented, including any guidelines, circulars, notifications and clarifications framed or issued thereunder (the “**IFSCA FM Regulations**”) by the International Financial Services Centres Authority (the “**IFSCA**”), prescribe that Alpha Alternatives Fund Advisors LLP (IFSC Branch), registered as a Registered FME (Non-Retail) (the “**FME**”) under the IFSCA FM Regulations, should have an efficient and effective mechanism for handling of complaints and redress grievances of their clients so as to ensure a transparent, fair, and timely resolution of complaints and grievances.

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

“**Complaint**” means any expression or representation in writing or through other modes by the Investors, alleging deficiency in service, product or conduct of the FME 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 FME
- f. Complaints about any unregistered/ un-regulated activity
- g. References in the nature of seeking information or clarifications about financial products or service

C. Appointment of Designated Person

- C.1. The FME shall designate one of its personnel (i.e. Compliance Officer) as the **Complaint Redressal Officer (“CRO”)** who shall seek to attend and address any Complaint/ grievance/ query/ concern at the earliest as per the said policy. The CRO shall ensure that handling and disposal of Complaint is in accordance with the regulatory requirements specified by IFSCA.
- C.2. The FME shall designate one of its senior level personnel as the **Complaint Redressal Appellate Officer (“CRAO”)** who shall be responsible for handling appeals of Investors against the decision taken by the CRO. Further, the Complaint should be directly addressed to the CRAO where the Complaint is in relation to the CRO.
- C.3. The FME will ensure that CRO and CRAO are vested with the necessary authority and independence to handle Complaints received from the Investors.

D. Complaint Handling Procedure

D.1. Submission of Complaint:

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

D.2. Acknowledgment:

- Each Complaint shall be acknowledged by the CRO within **3 (three) working days** of receipt through email.
- In case of non-acceptance, the FME shall inform the complainant of the same within **3 (three) working days** of receipt of Complaint along with reasons.

D.3. Assessment and Resolution:

- The CRO will classify Complaints based on severity & urgency and shall examine & process the Complaint in a fair, transparent, professional and impartial manner.

- The CRO may, if required, ask for additional information from the complainant while processing the Complaint.
- Complaints should generally be resolved within **15 (fifteen) 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 shall be **30 (thirty) days** from the acceptance of Complaint.

D.4. Communication of Outcome:

- The outcome of the Complaint (i.e. resolution/ rejection) shall be communicated by the FME to the complainant in writing, including reasons for decisions made.

E. Appeal Mechanism

If a complainant is not satisfied with the resolution provided by the CRO or if the Complaint has been rejected by the CRO, the complainant may file an appeal before the CRAO.

E.1. Filing an Appeal:

- If the complainant is dissatisfied with the resolution, he may file an appeal with the CRAO within **21 (twenty-one) days** from the receipt of decision from the FME.

E.2. Review by CRAO:

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

E.3. Communication:

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

F. Complaint before the IFSCA

Where a complainant is not satisfied with the decision of the FME and has exhausted the appellate mechanism of the FME, he may file a Complaint before the IFSCA through email to grievance-redressal@ifsc.gov.in, preferably within 21 (twenty-one) days from the receipt of the decision from the FME.

G. Maintenance of records, disclosure of policy and the name contact details of CRO and CRAO on website of the entity

This policy shall be disclosed on the website of the parent of the FME, under the heading “Complaint Handling and Grievance Redressal”. Further, the name and contact details of the CRO and the CRAO shall also be displayed under this section.

H. Maintenance of records

The FME shall maintain all records relating to handling of complaints, including the following:

- a. Complaints received and processed;
- b. All correspondence exchanged between the FME and the complainants;
- c. All information and documents examined and relied upon by the FME while processing of the Complaints;
- d. Outcome of the Complaints;
- e. Reasons for rejection of Complaints, if any;
- f. Timelines for processing of Complaints; and
- g. Data of all Complaints handled by it

The FME shall maintained all the records in electronic retrieval form for the same period as mandated by the IFSCA under the relevant and applicable regulations and circulars, handbooks, guidelines thereunder.

Provided that in case there is no specific mention of such time period, the records 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 records shall be maintained for the applicable period, after final disposal of the proceeding.

I. Reporting

- a. The details / reports on handling of complaints shall be filled by the FME in the form and manner specified by IFSCA 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 the Annual Report.

Contact Details

Complaint Redressal Officer (CRO)

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Complaint Redressal Appellate Officer (CRAO)

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