

Tamarind Capital Investments India IFSC Private Limited

Investor Grievances Redressal Policy

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Policy Owner	Compliance

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Contact Details of Tamarind Capital Investments India IFSC Private Limited

Unit No. 50, The Platform, 11T2, Block-11, GIFT City, Gandhinagar - 382355, Gujarat, India.

Email id for sending all queries and complaints: vishal@tamcap.investments

Details of Complaint Redressal Officer (CRO):

Mr. Vishal Sondagar
Compliance Officer
vishal@tamcap.investments

Details of Complaint Redressal Appellate Officer (CRAO):

Mr. Rahul Agarwal
Principal Officer
ra@tamcap.investments

INVESTORS GRIEVANCES REDRESSAL POLICY

Title

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

Preamble

Tamarind Capital Investments India IFSC Private Limited is registered as Fund Management Entity – Non-Retail (“FME – Non-Retail”) under the International Financial Services Centres Authority (Fund Management) Regulations, 2022 (“FME Regulations”). Tamarind Capital Investments India IFSC Private Limited shall act as the fund management entity for all the AIFs registered and Portfolio Management Services provided to clients/investors with International Financial Services Centres Authority (“IFSCA”) under the FME Regulations. Tamarind Capital Investments India IFSC Private Limited will be providing fund management services to various GIFT IFSC based Portfolio Management Services (PMS), AIFs registered/to be registered with IFSCA (“GIFT AIFs”) in capacity as the FME – Non Retail. All these GIFT AIFs/PMS would be governed by the FME Regulations including the applicable circulars, guidelines etc. issued by IFSCA from time to time, as well as their respective Fund Documents (i.e. Private Placement Memorandum, Indenture of Trust, Contribution Agreement/Limited Liability Partnership Agreement and Investment Management Agreement for AIFs and Draft Disclosure Documents, Discretionary Portfolio Management Services Agreement and Non-Discretionary Portfolio Management Services Agreement for PMS) (hereinafter referred to as the “Fund Documents”)

Philosophy

Tamarind Capital Investments India IFSC Private Limited 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.

Objective

1. This Policy is formulated to provide efficient services to the investors and to effectively address and redress the grievances of the investors of GIFT AIFs/PMS in a timely manner.
2. The coverage of this policy is to redress the grievance of investor of all the GIFT AIFs and PMS.

Definition:

“Complaint” means matter initiated / escalated in writing (through the registered email or through paper with registered signature) to CRO / any other complaint related platform/email id created by Regulatory Authority.

(an indicative list of matters not considered as ‘complaint’ is mentioned at Schedule-I)

“Complaint Redressal Officer” or **“CRO”** shall be an employee of Tamarind Capital Investments India IFSC Private Limited responsible for handling of complaints received from its consumers

“Complaint Redressal Appellate Officer” or **“CRAO”** shall be a senior level person of Tamarind Capital Investments India IFSC Private Limited designated for handling appeals of consumers against the decision taken by the Complaint Redressal Officer of Tamarind Capital Investments India IFSC Private Limited;

“Grievance” means any issue, displeasure, deficiency expressed by investors and submitted in writing (through the registered email or through paper with registered signature) to their Relationship Manager/ Tamarind Capital Investments India IFSC Private Limited.

Guiding Principles

Tamarind Capital Investments India IFSC Private Limited’s 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;
- Compliance Officer of Tamarind Capital Investments India IFSC Private Limited shall act as Complaint Redressal Officer” or “CRO” and Principal Officer of Tamarind Capital Investments India IFSC Private Limited shall act as Complaint Redressal Appellate Officer” or “CRAO”;
- Tamarind Capital Investments India IFSC Private Limited 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 Tamarind Capital Investments India IFSC Private Limited will work in good faith and without prejudice to the interests of the Investor(s).

Investor Service Timelines and Redressal Mechanism

In order to make redressal mechanism more meaningful and effective, a structured system will function at Tamarind Capital Investments India IFSC Private Limited, which will ensure that redressal sought is just and fair and done in a timely manner.

The Internal Mechanism to be followed by Tamarind Capital Investments India IFSC Private Limited to handle Investor complaints/grievances will be as follows:

1. The Investors can raise their Grievance either directly to Tamarind Capital Investments India IFSC Private Limited or to Representative of Tamarind Capital Investments India IFSC Private Limited or to the fund administrator by giving details of their name, folio no., name of the fund invested in, nature and full particulars of their complaint.
2. The Compliance Officer of Tamarind Capital Investments India IFSC Private Limited is responsible to ensure timely and prompt communication with Investors and distributors. Investors can write to Tamarind Capital Investments India IFSC Private Limited for any queries / clarifications that they may have.
3. On receipt of grievances, Tamarind Capital Investments India IFSC Private Limited needs to ensure that it is responded / clarified / resolved in the reasonable time.
4. If the Investor not satisfied with the response / clarification / resolution provided for the grievance, he/she can escalate the matter / complaint to the CRO of Tamarind Capital Investments India IFSC Private Limited ("Complaint").
5. On receipt of a Complaint, CRO of Tamarind Capital Investments India IFSC Private Limited shall make an assessment on the merits of the complaint. Pursuant to assessment:
 - a. In case of acceptance, Tamarind Capital Investments India IFSC Private Limited shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
 - b. In case of non-acceptance, Tamarind Capital Investments India IFSC Private Limited shall inform the complainant within 5 working days along with reasons.
6. Tamarind Capital Investments India IFSC Private Limited shall examine and process the complaint in a fair, transparent, professional and impartial manner.
7. Tamarind Capital Investments India IFSC Private Limited may ask for additional information from the complainant while processing the complaint. No complaint will be acknowledged by Tamarind Capital Investments India IFSC Private Limited without sufficient information. A last receipt date of full and complete information about the complaint will be treated as the date of complaint.
8. Multiple correspondence / communications or reminders received for the same matter within the stipulated turnaround time in this Policy for handling of the query / communication will be treated as one complaint.
9. In case of rejection of a Complaint, Tamarind Capital Investments India IFSC Private Limited shall give reasons for rejection of the Complaint, in writing.
10. After examining the matter, Tamarind Capital Investments India IFSC Private Limited shall dispose of Complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of Complaint. Tamarind Capital Investments India IFSC Private Limited may either resolve the Complaint or reject the Complaint.
11. Provided that in case the resolution is expected to take longer time period, then an intermediate response shall be made to the Investor intimating the expected timeline of the

resolution.

12. If a complainant is not satisfied with the resolution provided by Tamarind Capital Investments India IFSC Private Limited or if the complaint has been rejected by Tamarind Capital Investments India IFSC Private Limited, the complainant may file an appeal before the CRAO of Tamarind Capital Investments India IFSC Private Limited preferably within 21 days from the receipt of the decision from the CRO.
13. The CRAO shall dispose of the Appeal within a period of 30 days.
14. Complaints turned into dispute /litigation shall be handled as per the provisions of the Fund documents.
15. All grievance resolutions shall be undertaken as per the FME regulations and within the framework of the Fund documents of the respective FME AIFs/PMS.
16. While the responsibility of resolution of any complaint rests with Tamarind Capital Investments India IFSC Private Limited, the services of Fund Administrator may be used for all communication with the investor w.r.t any Complaint.

Complaint before the Authority:

Where a complainant is not satisfied with the decision of Tamarind Capital Investments India IFSC Private Limited and has exhausted the appellate mechanism of Tamarind Capital Investments India IFSC Private Limited, he may file a Complaint before the Authority through email to grievance-redressal@ifsc.gov.in preferably within 21 days from the receipt of the decision from Tamarind Capital Investments India IFSC Private Limited:

Maintenance of records:

- a) Tamarind Capital Investments India IFSC Private Limited shall maintain all records relating to handling of complaints, including the following:
 - Complaints received and processed;
 - All correspondence exchanged between Tamarind Capital Investments India IFSC Private Limited and the complainants;
 - All information and documents examined and relied upon by Tamarind Capital Investments India IFSC Private Limited while processing of the complaints;
 - Outcome of the complaints;
 - Reasons for rejection of complaints, if any;
 - Timelines for processing of complaints; and
 - Data of all complaints handled by it.
- b) Tamarind Capital Investments India IFSC Private Limited shall maintain records in electronic retrieval form for the same period as mandated by 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 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.

Reporting:

Tamarind Capital Investments India IFSC Private Limited shall file reports on handling of complaints in the form and manner specified by the IFSCA from time to time

The Annual Report of the respective fund/scheme shall have a section with heading "Complaint Handling and Grievance Redressal". The section shall also provide data of all complaints received, resolved, rejected and pending during the year in a tabular/ graphical format.

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 Compliance Officer and with the approval of the Principal Officer of Tamarind Capital Investments India IFSC Private Limited.

Schedule I:

1. Anonymous complaints not sent from registered email of the investor or under the registered signature of the investor, as applicable
2. Incomplete or un-specific complaints
3. Allegations without supporting documents
4. Suggestions or seeking guidance/explanation.
5. Any service request such as transfer, pledge, change in bank details, change in address, nominations etc.
6. Complaints on matters not relating to the financial products or services provided by the Tamarind Capital Investments India IFSC Private Limited
7. Complaints about any unregistered/ un-regulated activity
8. References in the nature of seeking information or clarifications about financial products or services - Routine questions / clarifications sought by the fund investors, may be relating to their investments, distribution, tax, drawdown, fund performance, investor reporting, etc.