

## Abakkus Asset Manager Private Limited (formerly known as Abakkus Asset Manager LLP)

### Grievance Redressal Policy

S. No.	Details of Change	Date of creation / change	Author	Version no.	Approved by
1	First Policy	10.11.2022	Compliance, Risk and Legal Team	V.1	Designated Partners
2	Revised as per SEBI Circular for redressal of investor grievances and Online Resolution of Disputes	15.09.2023	Compliance, Risk and Legal Team	V.2	Designated Partners
3	Update pursuant to change in legal status of the Company, including details of the GIFT IFSC Branch and other related changes	25.09.2024	Compliance, Risk and Legal Team	V.3	Board of Directors

The Grievance Redressal Policy shall apply to all employees involved in Products , Sales team, Service, Operations team, Investment team and Compliance team. All shall carefully read the contents of the Policy and comply with the requirements at all times.

#### A. Introduction

Abakkus Asset Manager Private Limited (Formerly known as Abakkus Asset Manager LLP) (hereinafter referred to as '**Abakkus**') acts as an Investment Manager to SEBI registered Category I, II & III Alternative Investment Funds under SEBI (Alternative Investment Funds) Regulations, 2012. Abakkus is also registered to act as a Portfolio Manager under SEBI (Portfolio Managers) Regulations, 2020 for Discretionary, Non-Discretionary and Advisory Portfolio Management Services. Further, Abakkus undertakes Investment Advisory Services under SEBI (Investment Advisers) Regulations, 2013 through its Investment Advisory Division known as Abakkus Investment Advisors.

Abakkus through its GIFT City Branch is registered with International Financial Services Centres Authority ('IFSCA' or 'Authority') as Registered (Non-Retail) Fund Management Entity (FME) vide registration no. IFSCA/FME/II/2022-23/041 under IFSCA (Fund Management) Regulations in **GIFT City, Gandhinagar, Gujarat (Abakkus FME)**.

The Grievance Redressal policy outlines the grievance handling process through a structured grievance redressal framework. Investor inquiries and complaints are a significant voice for the Investors and a prompt and effective service is crucial for maintaining existing partnerships. Abakkus has established principles and framework to handle both queries and grievances to ensure that

- a. All Investors are treated in a fair and equitable manner.
- b. Complaints raised by Investors are dealt in a timebound manner.
- c. Investors are provided with information on how to raise their issues and complaints and escalate if they are not satisfied with the resolution or handling.
- d. A dedicated Customer Services Team is in place to handle customer queries and complaints. The process is supervised by a senior resource.

## **B. Grievance Raising Mechanism**

Investors are entitled to make a complaint in writing, orally or telephonically directly to Abakkus. Investors that are serviced by their independent advisors or distributors can also raise their complaints through their advisors and distributors.

1. It is mandatory for the Investor having grievance to take up the matter directly with Abakkus at first place.
2. For complaints related to PMS, IA and AIF, the Investors can directly reach Abakkus through email at:  
[service@abakkusinvest.com](mailto:service@abakkusinvest.com) and [complianceteam@abakkusinvest.com](mailto:complianceteam@abakkusinvest.com) (both)
3. Investors can contact Abakkus through telephone at:  
+91 22 6884 6601/02/85
4. Investors can send letters to Abakkus at:  
Abakkus Corporate Centre, 6th Floor,  
Param House, Shanti Nagar,  
Near Grand Hyatt, Off Santacruz Chembur Link Road,  
Santacruz East, Mumbai – 400055
5. Abakkus shall endeavour to redress the Investor complaint(s) within within 21 (twenty-one) calendar days from the date of the receipt of the complaint by Abakkus.
6. If Investors are still not satisfied with the response from Abakkus, they can lodge their grievances with SEBI at SCORES 2.0 portal (<https://scores.sebi.gov.in/>) or may also write to any of the offices of SEBI or contact SEBI Office on Toll Free Helpline at 1800 266 7575 / 1800 22 7575. The complaint shall be lodged on SCORES within one year from the date of cause of action, where the complainant has approached Abakkus, for redressal of the complaint and
  - Abakkus has rejected the complaint or,
  - The complainant has not received any communication from Abakkus or,
  - The complainant is not satisfied with the reply received or the redressal action taken by Abakkus.

7. SCORES may be accessed through SCORES mobile application as well, same can be downloaded from below link:  
<https://play.google.com/store/apps/details?id=com.sebi&pli=1>  
<https://apps.apple.com/in/app/sebiscORES/id6478849917>
8. Abakkus shall submit an Action Taken Report (“ATR”) on SCORES within 21 Calendar days. If Client is not satisfied with the Redressal or no ATR has been filed within above mentioned days by the Abakkus, then the client can opt for 1st review within 15 days. Thereafter, the complaint shall be escalated to the Designated body. SEBI has appointed Association of Portfolio manager in India (APMI) and BSE Limited as Designated body for Portfolio Manager & Investment Adviser respectively.
9. The Designated Body shall seek clarification from Abakkus or the client, as required. Once the designated body has received the clarification then they shall upload the revised ATR on SCORES within 10 days.
10. If Complainant is not satisfied with the 1st review or ATR is not uploaded by the designated body in 10 days, then the Complainant can opt for 2nd review within 15 days. Thereafter, the complaint shall be escalated to supervising official of the dealing officer of SEBI and he shall seek clarifications from the Abakkus or the client for the same.
11. If satisfied, SEBI shall dispose the Complaint with reasonable closure remarks & if not satisfied then SEBI shall advice the client to opt for Online Dispute Resolution by registering the compliant on Online Dispute Resolution Portal (“ODR Portal”) at <https://smartodr.in/login>  
  
Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with Abakkus is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.
12. The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in SCORES guidelines or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law.
13. The process on Online Dispute Resolution Mechanism is available at <https://abakkusinvest.com/regulatory-disclosure/>
14. For Abakkus FME overall grievance redressal mechanism, process, reporting etc. is mentioned in detail in the **Annexure C** of this Policy.

#### **C. Contact for assistance in filing complaints.**

- The Investors may contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on SCORES.
- The list of IAs is available on SEBI website (www.sebi.gov.in).
- Investors may also seek assistance in filing complaints on SCORES from SEBI's toll free helpline number 1800 266 7575 or 1800 22 7575.

#### **D. Process to register a complaint.**

- Investors who wish to lodge a complaint on SCORES 2.0 (complainant) are required to register themselves on <https://scores.sebi.gov.in/> by clicking on “Sign in/Sign up”.
- While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email ID, Aadhaar card number(optional), Central KYC (CKYC) ID (optional) etc. are required to be provided for effective communication and speedy redressal of the grievances.
- Upon successful registration, a unique user ID and a password shall be generated and communicated through an acknowledgement email to the complainant.
- If the Investor is unsatisfied, then he may register the same on ODR portal. The Investors will have to register themselves on <https://smartodr.in/login> under “Investor Login”.
- While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email Id, Address are required to be provided.
- Upon successful registration, the investor will receive an email on the registered email address with a link to verify his/her account.

#### **E. Internal Grievance Redressal Process.**

The Customer Services Team receiving the query/complaint is responsible for the resolution of query/complaint. The Head (Customer Services Department) at the first level is responsible for ensuring that the query / complaint is resolved to the investor’s satisfaction and must attempt to offer the investor alternate solutions, however if the investor remains unsatisfied with the resolution, he can escalate the issue through the grievance redressal mechanism as mentioned above.

Queries and complaints are investigated at the various levels of escalation as maintained by Abakkus, within the time frame allotted. The investor is informed of the turnaround time for specific sorts of questions or complaints that require additional time for inquiry in case they involve fraud, legal considerations, or input from a third party. It is crucial that Abakkus promptly communicates its position on any topic, and it does so in a transparent and investor-friendly manner.

#### **F. Display of Complaints Data:**

The details of the complaints including SCORES complaints related to PMS and IA shall be disclosed on the website on monthly basis by 7<sup>th</sup> of the succeeding month in the format provided in **Annexure A** and related to AIF shall be compiled by the Abakkus Compliance department on quarterly basis by 7<sup>th</sup> in the format provided in **Annexure B** or such other format as may be prescribed by SEBI from time to time.

The details of complaints shall also be provided in the private placement memorandum of the schemes of Abakkus AIF within one month of end of each financial year.

#### **G. Management Information System (MIS) report of Investor Complaints:**

A MIS report of the complaints received, pending, and resolved will be placed before the Partners of the Abakkus, at regular intervals for their review and information.

#### **H. Maintenance of Records:**

The Register of complaint and Grievance shall be maintained and updated with details of complaints and its resolution thereof with time take for resolution.

The soft copies / hard copies of the complaints received from the Investor shall be preserved by the Customer Services team for future reference, if required.

A detailed report of complaints received and resolved and reasons for delay if any for resolution will be recorded.

The Register of complaint and grievance will be maintained for such period as prescribed by regulatory authority from time to time.

#### **I. Review of Policy**

The Policy should be placed before the management and if any changes in the policy are warranted, the revised policy should be placed before the management for review and approval. Views of concerned Business Heads and chief of Internal Audit, if any, may be taken into account where the management finds it necessary. The policy will be reviewed once in a year by the Principal Officer/ Compliance Officer and one of the Partner(s).

A copy of this policy is made available at <https://abakkusinvest.com/regulatory-disclosure/>

**Annexure A**

Data for the month ending - \_\_\_\_\_

Sr no.	Received from	Pending at the end of last month	Received	Resolved*	Total Pending#	Pending complaints > 3 months	Average Resolution time^ (in days)
1	Directly from Investors						
2	SEBI (SCORES)						
3	Other Sources (if any)						
	<b>Grand Total</b>						

^ Average Resolution time is the sum total of time taken to resolve each complaint in days, in the current month divided by total number of complaints resolved in the current month.

Trend of monthly disposal of complaints

Sr No	Month	Carried forward from previous month	Received	Resolved*	Pending#
1	April YYYY				
2	May YYYY				
3	June YYYY				
	Grand Total				

\*Inclusive of complaints of previous months resolved in the current month.

#Inclusive of complaints pending as on the last day of the month.

Trend of annual disposal of complaints

<b>SN</b>	<b>Year</b>	<b>Carried forward From previous year</b>	<b>Received</b>	<b>Resolved**</b>	<b>Pending##</b>
1	2020-2021				
2	2021-2022				
3	2022-2023				
4	2023-2024				
5	2024-2025				
	<b>Grand Total</b>				

\*\*Inclusive of complaints of previous years resolved in the current year.

##Inclusive of complaints pending as on the last day of the year.

## Annexure B

Investor complaints data for the quarter ending (March/June/September/December)

Sr no.	Investor Complaints received from	Pending at the end of last quarter	Received	Resolved	Total Pending at the end of the quarter	Pending complaints > 3months	Average Resolution time^ (in days)
1	Directly from Investors						
2	SEBI (SCORES)						
3	Other Sources (if any)						
	<b>Grand Total</b>						

^ Average Resolution time is the sum total of time taken to resolve each complaint in days in the current quarter divided by total number of complaints resolved in the current quarter.

2. Investor complaints data for last three Financial Years (FY)

SN	Year	Carried forward From previous year	Received	Resolved	Pending at the end of FY
1	2021-2022				
2	2022-2023				
3	2023-2024				
	Grand Total				

## Annexure C

### ABAKKUS FME - GRIEVANCE REDRESSAL MECHANISM, PROCESS, REPORTING

- It is mandatory for the Investors having grievance to take up the matter directly with Abakkus FME at first place.
- For complaints related any services offered by Abakkus FME, the investors can directly reach through email at:
  - Name: Surendra Mali
  - Designation: Compliance Officer
  - Contact No.: 9602029480
  - Email id: [giftcity@abakkus.in](mailto:giftcity@abakkus.in) & [complianceteam@abakkusinvest.com](mailto:complianceteam@abakkusinvest.com) ( both)
- The Investors can also send letters to Abakkus FME:  
Unit No 79, The Platform, Ground Floor, Block 11, GIFT SEZ,  
Gandhinagar- 382355, Gujarat.
- Abakkus FME shall endeavour to redress the complaint(s) within 21 (twenty-one) calendar days from the date of receipt of the complaint.
- **Request for Additional Information:** Abakkus FME may seek further details from the complainant to facilitate resolution.
- **Internal Grievance Redressal Process.**  
The Abakkus FME receiving the query/complaint is responsible for the resolution of query/complaint. The Complaint Redressal Officer (CRO) i.e. Compliance Officer of FME at the first level is responsible for ensuring that the query / complaint is resolved to the investor's satisfaction and must attempt to offer the investor alternate solutions, however if the investor remains unsatisfied with the resolution, he can escalate the issue to Complaint Redressal Appellate Officer (CRAO) i.e. Principal Officer of the FME. The Abakkus GIFT, IFSC Branch team receiving the query/complaint shall revert to the query/complaint on the designated email id's of the investor or by way of letter, as the case may be.
- **Appeal to IFSCA**  
If Investors are still not satisfied with the response from Abakkus FME they may appeal to IFSCA at [grievanceredressal@ifsc.gov.in](mailto:grievanceredressal@ifsc.gov.in) preferably within 21 days of the CRAO's decision.
- **Reporting to IFSCA**  
Abakkus FME shall file reports on handling of complaints in the form and manner specified by the IFSCA Authority from time to time.  
Abakkus FME shall have a section with heading "Complaint Handling and Grievance Redressal" in its Annual Report, if the entity is required to file an annual report for its business activities in the IFSC under the applicable laws. The section shall also provide data of all complaints received, resolved, rejected and pending during the year in a tabular/ graphical format.

Provided that where a FME is not required to file an annual report for its business activities in the IFSC, it shall display the information on complaint handling on its website or on a dedicated webpage of its Group Entity, as applicable, under the heading “Complaint Handling and Grievance Redressal”, on an annual basis.

- **Maintenance of Record**

The Abakkus FME shall maintain all records as statutorily required under the IFSCA rules and regulations.

- **Compliance Officer Responsibility**

The Compliance Officer of FME will oversee adherence to grievance redressal requirements and ensure alignment with applicable regulations. The responsibilities on any other official (such as principal officer) w.r.t. grievance redressal mentioned in the regulations, under which the FME is registered or authorized or licensed with the Authority, shall also continue to apply.

- **Enforcement**

Non-compliance with this policy may result in regulatory actions by IFSCA, as specified under the International Financial Services Centres Authority Act, 2019.