Title	Policy on Complaint Handling, Grievance Redressal & Dispute Resolution
Policy Owner	Compliance Department
Tentative next review	On any Regulatory change or Annually, whichever is earlier

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Checked by [Name and Signature]	Mr. Suresh Kumar Jain
Approved by [Name and Signature]	Board of Directors
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1. **Title**

Policy on Complaint Handling, Grievance Redressal & Dispute Resolution ("Policy")

2. **Objective**

In the present competitive scenario, excellence in investor service is the most important tool for sustained business growth. Areion Assets Management Private Limited has always given high priority to investor satisfaction. Providing prompt and efficient response to any investor request/query/grievance/complaint is essential, not only to attract new investors, but also to retain the existing ones. This Policy aims at appropriately handling investor requests/queries/grievances/complaints through a frame work of proper service delivery and review mechanism as well as to ensure prompt redressal of the same. In order to make redressal mechanism more meaningful and effective, a structured system should function, which should ensure that redressal sought is just and fair and within the given frame-work of rules and regulations.

3. **Regulatory Background**

3.1 SEBI Circular No. CIR/MIRSD/3/2014 dated August 28, 2014 Information regarding Grievance Redressal Mechanism;

3.2 SEBI Circular No. CIR/OIAE/1/2014 dated Dec 18, 2014 (SCORES) Redressal of investor grievances through SEBI SCORES;

3.3 SEBI Circular SEBI/HO/OIAE/IGRD/CIRP/2019/86 dated August 02, 2019 Streamlining issuance of SCORES Authentication for SEBI registered intermediaries;

3.4 SEBI Circular SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/131 dated 31st July, 2023;

3.5 SEBI Circular SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated 20th September, 2023.

4. **Applicability**

This Policy is applicable to Areion Assets Management Private Limited (herein after known as "Investment Manager") which is acting as investment manager to various scheme of Alternative Investment Fund (AIF) registered with SEBI.

5. **Implementation / Process**

The Policy is essentially based on the below noted guiding principles:

- Our investors will be treated fairly at all times;
- Grievances/complaints raised by our investors will be dealt with promptly and with due courtesy;
- Our investors will be fully informed of avenues to escalate their complaints/grievances within the organization and of their rights to alternative remedy if they are not fully satisfied with the response received to their complaints;
- Investment Manager will deal with all complaints efficiently and fairly, being deeply cognizant of the fact that the smallest of complaints can damage the company's reputation and standing, if not attended to properly; and
- The customer service executives / employees of Investment Manager will work in good faith and without prejudice to the interests of the investor.

The brief process to handle investor requests/queries/grievances/complaints is as stated below (detailed process given later):

a. If the Investor wants to make or register requests/queries/grievances/ complaint, Investment Manager has made known all relevant mediums:
    - Where to make the same
    - When to expect a reply
    - Whom to approach for redressal
    - Escalation mechanism
b. Investment Manager will inform Investors where to find the details of procedures for handling requests/queries/grievances/complaints fairly and quickly.
c. If the Investor requests/queries/grievances/complaint is received in writing, Investment Manager will provide an immediate acknowledgement. If an Investor requests/queries/grievances/complaint is received over phone or through email, Investment Manager will acknowledge the same within 10 days and will keep the investor informed of the progress and resolve it within 30 days. Investors can also lodge their complaints through SEBI's web based centralized grievance redress system called SEBI Complaint Redress System (SCORES) at http://scores.gov.in.
d. As per SEBI circular CIR/MIRSD/3/2014 dated August 28, 2014, details on grievance redressal mechanism have to be prominently displayed in their offices. The format is enclosed as **Annexure 1**.

PROCESS

In an endeavor to provide centralized management and tracking of investor grievances, the following process has been set for gathering information related to *service requests, queries, grievances and complaints* received – (a) directly from investors, (b) through distributors/ agents, (c) through regulators i.e., SEBI, etc., (d) any other source not specifically mentioned here.

A. Touch Points

The following are the touch points through which investors (existing or perspective) can seek clarifications & get their concerns addressed:

(a) Telephone Number of Investment Manager

(i) 022-69231222

(b) Email of Investment Manager

(i) compliance.aif@areion.in

(c) Letter

Investors may also write to:

Compliance Officer
D/511, Kanakia Zillion,
Junction of L.B.S road and CST Road,
B.K.C Annexe, Near Equinox,
Kurla (West),
Mumbai- 400 070

Communication Address
47th Floor, Kohinoor Square,
N.C Kelkar Road,
Dadar West,
Mumbai-400028

(d) SEBI SCORES Platform

Investors have the option to raise a grievance or complaint through the SEBI SCORES Platform at http://scores.gov.in.

(e) Online Dispute Resolution Platform: Investor have the option to resolve dispute through SMARTODR Portal at https://smartodr.in/login

B. Collation

The Compliance Officer will be responsible for collation of all service requests, queries, grievances and complaints received from various touch points.

Any service requests, queries, grievances and complaints received:

- at a ***number*** other than the designated telephone number or
- at an ***email id*** other than the designated email ids
- by way of a ***letter*** at an address other than the designated address should be immediately brought to the attention of the Compliance Officer.

- Any grievance or complaint, received from ***SEBI*** (through the SCORES Portal) shall be promptly forwarded by the Compliance Team.

All service requests, queries, grievances and complaints received will be recorded in investor grievance register.

C. Tagging

All concerns raised by investors will be tagged and bucketed into:

(a) Service Request

(b) Query

(c) Grievance

(d) Complaints

Data of all such service requests, queries, grievances and complaints will be maintained by the Compliance officer

Below is a list of examples; however, the same are not exhaustive:

(a) Service Request

i. Request for account statement
ii. Request for monthly/ quarterly portfolio
iii. Request for Change of Address
iv. Change of Bank Mandate

v. Change in Mode of Holding
vi. Change of Status
vii. Transmission
viii. Registration/ Cancellation of Nominee
ix. Pledge / Un-pledge the Units
x. Registration/Revocation of Power of Attorney (POA)
xi. Duplicate statement
xii. Request for re-dispatch of Returned Un-delivered documents / statements
xiii. Request for Private Placement Memorandum
xiv. Request for Tax Deduction at Source (TDS) Certificate
xv. Others – Miscellaneous Service Request

(b) Query

i. Discrepancy in personal data
ii. Discrepancy in investment data
iii. Non receipt of redemption proceeds
iv. Non receipt of Units or Units Certificate
v. Taxation related query
vi. Wrong allotment of units/ Wrong application
vii. Excess or wrong charge of load
viii. Wrong calculation of TDS/
ix. Non-receipt of annual report

(c) Grievance

i. Performance of Scheme / Portfolio
ii. Lapse in service due to Investment Manager not providing complete information
iii. Lapse in service due to external factor
iv. Repeated reminders on queries being unanswered

(d) Complaints

i. Delay – exceeding turnaround time (TAT) defined by Investment Manager /SEBI, whichever is lower
ii. Accuracy – wrong / error in processing / incorrect information / misguidance / mis-selling

iii. Completeness – incomplete / inadequate service
iv. Deviation in any aspect defined in the PPM/ SEBI – service / investment related
v. Behavior of service personnel – impolite / misbehavior
vi. Any other action that is not acceptable / in line with general service standard

The lapses on any of the above ground need to be proved.

If such lapse is due to the Investment Manager / Investment Manager's service provider, the same shall be treated as a complaint. If such lapse is not due to the Investment Manager/ Investment Manager's service provider but due to investor / any external agency, the same shall be treated as grievance.

In case of any doubt with respect to tagging / classification of a particular case the Compliance Team shall consult the Director of Investment Manager.

D. Escalation matrix

If grievances and complaints is not resolved and the time limit exceeds 15 days from the receipt, the said will be escalated to Director of Investment Manager.

E. Grievances or Complaint received through SCORE

Compliance Officer will redress the grievance within 30 days from the date of receipt from SCORE failing which the complaint shall be registered in SCORES. The Compliance Officer shall update the action taken report (ATR) along with supporting documents, if any, electronically in SCORES. The proof of dispatch of the reply of the Compliance Officer to the concerned investor should also be uploaded in SCORES and preserved by the Compliance Officer for future reference.

A complaint shall be treated as resolved/disposed/closed only when SEBI disposes/closes the complaint in SCORES. Failure by Investment Manager to file ATR under SCORES within thirty days of date of receipt of the complaint shall not only be treated as failure to furnish information to SEBI but shall also be deemed to constitute non-redressal of investor complaint.

F. Complaint Review Process

- Status Report shall be made by the operations team which would contain the number of queries/grievances/complaint received, number of queries/ grievances/ complaint resolved and the number of pending queries/ grievances/ complaint (if any), the reasons for the same, etc .
- The Status Report shall be put up to the Board Members of Investment Manager at a quarterly basis and to the Whole Time Director of the Investment Manager on monthly basis.

G. Disclosure

On periodic basis the status of investor complaints shall be updated to the SEBI in Quarterly Reports filed with SEBI, if applicable.

H. ARBITRATION & DISPUTE RESOLUTION

All disputes, differences, claims and questions whatsoever arising between the investor and Investment Manager and/or their respective representatives shall be settled in accordance with the provision of The Arbitration and Conciliation Act, 1996 or any statutory requirement, modification or re-enactment thereof for the time being in force. Such arbitration proceedings shall be held at Mumbai or such other place as Investment thinks fit. The Arbitration shall be held in English. The Arbitration Award shall be treated as final and shall be binding on both parties. This arbitration clause is subject to the jurisdiction of courts in Mumbai only.

The arbitration will be presided over by three arbitrators: one each appointed by the disputing parties and the other chosen by the other 2 (two) arbitrators so nominated by the parties. The arbitrators shall be persons of professional repute who are not directly or indirectly connected with any of the Parties to this Agreement. They shall have prior experience as arbitrators. Each party will bear the expenses / costs incurred by it in appointing the arbitrator and for the arbitration proceedings. However, the cost of appointing the presiding arbitrator will be borne equally by both the parties.

6. **Responsibility**

The Compliance Officer of Investment Manager will be responsible for implementation of Policy.

7. **Violation**

If anyone is found in violation of this Policy, he/she will be liable for appropriate action by appropriate authority.

8. **Policy Review**

This Policy shall be reviewed as and when there are any regulatory changes are introduced or as and when it is found necessary to change the Policy due to business needs. However, Policy shall be reviewed at least annually. The Director of Investment Manager will be approving authority for the Policy.

9. **Deviation to Framework**

Major deviations to the Policy shall be approved by the Director; all other deviations shall be approved by Compliance officer of Investment Manager.

10. **Power to Remove Difficulties**

In order to remove any difficulties in the application or interpretation of this Policy, the Compliance Officer of Areion Assets Management Private Limited shall have the power to issue clarifications.

11. **Effective Date**

This Policy supersedes the earlier policy on this subject matter. This Policy shall be effective from 12th July 2025.

Date: 12th July 2025.

Annexure 1

Dear Investor,

In case of any grievance / complaint against the Intermediary:

Please contact Compliance Officer of the Intermediary Areion Assets Management Private Limited / email-id (compliance.aif@areion.in) and Phone No. – ***022-69231222***.

You may also approach Mr ***Suresh Kumar Jain*** / email-id (suresh@areion.in) and Phone No. - 91- ***9619997811***

If not satisfied with the response of the intermediary, you can lodge your grievances with SEBI at http://scores.gov.in or you may also write to any of the offices of SEBI.

For any queries, feedback or assistance, please contact SEBI Office on Toll Free Helpline at 1800 22 7575 / 1800 266 7575.