Areion Assets Management Private Limited

Complaint Handling and Grievance Redressal

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1. TITLE

Areion Assets Management Private Limited (IFSC Branch) (hereinafter referred to as "**the Company**"), is the Fund Management Entity ("**FME**") registered under International Financial Services Centres Authority ("**IFSCA**") as Registered FME (Non-Retail). The Company acts as a FME for the funds and/or schemes that it launches from time to time and as authorised by IFSCA.

2. PREAMBLE & OBJECTIVE

This Compliant Handling and Grievance Redressal Policy ("**Policy**") is made in compliance with the Circular no. F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs, dated December 02, 2024, issued by IFSCA for all the regulated entities in the IFSC. The Policy aims to protect the interests of consumers and ensure that consumer complaints are handled effectively, transparently, and within the stipulated timeframes.

This Policy applies to the Company, its clients, and the investors in the funds / schemes launched by the Company.

3. DEFINITIONS:

Following terms used this Policy shall have the meaning ascribed to them below:

(a) **"Complaint"** shall have the meaning ascribed to the term in Clause 4.1.

(b) **"Non-Complaint Communications"** shall have the meaning ascribed to the term in Clause 4.2.

(c) **"Query" or "Request"** shall mean a communication seeking information or clarification, which will not be classified as a complaint unless unresolved within the stipulated turnaround time.

(d) **"Consumer or Client "** shall mean a person who is engaged in a financial or activity with FME and includes a person on whose behalf the person engaged in the transaction or activity, is acting.

(e) **"Complaint Redressal Officer"** or **"CRO"** shall mean an employee of the FME responsible for handling complaints received from its consumers.

(f) **"Complaint Redressal Appellate Officer" or "CRAO"** shall mean a senior-level official of the FME responsible for appeals against decisions made by the CRO.

4. CLASSIFICATION OF COMMUNICATION:

4.1. Complaint.

A Complaint shall mean the following:

(a) communications that explicitly express dissatisfaction with Company's financial products or services.
(b) Complaints that meet the criteria for valid submission (e.g., supported with necessary details).

4.2. Non-Complaint Communications.

A Complaint shall not include the following:

(a) anonymous communications (excluding whistleblower reports);
(b) suggestions or general inquiries;
(c) allegations unsupported by documentation; and / or
(d) requests for clarification or additional information.
(e) Grievances relating solely to performance or investment underperformance.

4.3. General Principle for Classification of Consumers Communication.

(a) If a query is resolved after the stipulated turnaround time and there is no reminder from the Consumer during such time period, such query will not be treated as complaint.
(b) In case of any ambiguity, the CRO shall be the sole authority to decide on the nature and classification of the communication and the decision of the CRO shall be final and binding.
(c) 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.

4.4. Components of a Complaint.

All Complaints must include the following components:

(a) Consumer's name and contact details;
(b) folio details (where applicable);
(c) detailed description of the issue; and
(d) supporting documents, if applicable.

5. <u>COMPLAINT RECEIPT.</u>

Complaints can be submitted to Company's Compliance Officer who is designated as Complaint Redressal Officer through the following channels:

Email: compliance.giftcity@areion.in
Phone: +91 9967583555

6. <u>COMPLAINT HANDLING PROCEDURE</u>

6.1 **Acknowledgment**

Complaints will be acknowledged within 3 (three) working days of receipt, and the acknowledgement shall be sent by email, regardless of the mode of receipt.

6.2 **Acceptance or Rejection**

Accepted Complaints:

(a) CRO will notify the complainant of acceptance and initiate the resolution process.
(b) Resolutions by CRO will be provided within 15 (fifteen) working days, and no later than 30 (thirty) working days.

Rejected Complaints:

Complainants will be notified within 5 (five) working days, with reasons for rejection in writing.

6.3 **Escalation Process.**

If the complainant is dissatisfied with the resolution of the Complaint or its rejection, he/she may appeal to CRAO and then IFSCA (as applicable) as per the following:

(a) **Escalate to CRAO**
- Submit an appeal to CRAO at suresh.jain@areion.in and compliance.aif@areion.in within 21 (twenty one) working days of the decision by the CRO.
- The CRAO will resolve the appeal within 30 (thirty) days of receipt of the appeal.
- Any complaint escalated to the CRAO shall within reasonable period be reported to the Board of Directors of the Company.

(b) **Escalate to IFSCA**
- If unsatisfied after CRAO's review, the complainant may approach the IFSCA at grievance-redressal@ifsca.gov in within 21 (twenty-one) days of the CRAO's decision.

7. RECORD MAINTENANCE

7.1. The Company will maintain following records electronically for 6 (six) years or longer (as may be prescribed by applicable law from time to time) from the date of the disposal of each Complaint:

(a) Complaints received and processed;
(b) all correspondence exchanged between the Company and the complainants;
(c) all information and documents examined and relied upon by the Company 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.

8. REPORTING AND DISCLOSURE

8.1 Complaint statistics, including resolved, pending, and escalated complaints, will be included in Company's Annual Report and prominently displayed on its website on an annual basis.

8.2 Complaint statistics, including details of resolved, pending, and escalated complaints, shall be disclosed only if required under applicable regulatory provisions:

(a) Where the Company is required to file an Annual Report for its business activities in the IFSC, such information shall be included under the heading "Complaint Handling and Grievance Redressal" in the Annual Report.

(b) Where the Company is not required to file an Annual Report, the information shall instead be displayed on the Company website (or on a dedicated webpage of its Group Entity, as applicable) under the heading "Complaint Handling and Grievance Redressal" on an annual basis.

8.3 Company will submit periodic reports to IFSCA, as required by the applicable law.

9. CONTACT DETAILS

It details the designated points of contact at each level, starting with the initial point of contact for submitting a complaint, and progressing through higher levels for escalation of complaints. The matrix for complaint/grievance redressal flow is as provided below:

Level 1	Name: **Ms. Shivna Majmudar** Compliance Redressal Officer (CRO) Address: Unit No 219, First Floor, Pragya Accelerator II, Building - 15B, Block - 15, Road No – 1C, Zone – 1, Gift SEZ, Gift City, Gandhinagar – 382355 Email ID: compliance.giftcity@areion.in
Level 2	Name: **Mr. Suresh Kumar Jain** Complaint Redressal Appellate Officer (CRAO) Address: Unit No 219, First Floor, Pragya Accelerator II, Building - 15B, Block - 15, Road No – 1C, Zone – 1, Gift SEZ, Gift City, Gandhinagar – 382355 Email ID: suresh.jain@areion.in and compliance.aif@areion.in
Level 3	The complainant 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.

10. MISCELLANEOUS

10.1. The Policy will be reviewed periodically to ensure compliance with regulatory updates.
10.2. The Board of Directors will approve amendments.

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