

**Abakkus Investment Managers Private Limited
and Abakkus Trustee Private Limited**

GRIEVANCE REDRESSAL POLICY¹

ABAKKUS MUTUAL FUND

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1	First Version	July 22, 2025	Investor Relations Officer and Chief Operations Officer	1.0	Board of AMC and Trustees

¹ This policy is subject to updation pursuant to subsequent internal review and inputs

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GRIEVANCE REDRESSAL POLICY

1. INTRODUCTION, SCOPE & OBJECTIVE

- 1.1 The objective of the Policy is to provide and build prompt Investor Grievance Redressal Mechanism and investor friendly mechanism.
- 1.2 Prompt and efficient service is essential for retaining existing relationships and therefore investor satisfaction is critical to Abakkus Investment Managers Private Limited (“**the AMC**”). Investor complaints constitute an important voice of Investor and this Policy shall deal with complaint handling through a structured grievance redressal framework. Grievance redressal is supported by a review/feedback mechanism, to minimize the recurrence of similar issues in future.
- 1.3 The Grievance Redressal Policy is based on the following principles:
 - 1.3.1 Investors shall be treated fairly and without bias at all times.
 - 1.3.2 Complaints raised by investors shall be dealt with courtesy and in a timely manner.
 - 1.3.3 Investors shall be provided with information on how to raise their issues and complaints/service requests and escalate if they are not satisfied with the resolution or handling.
 - 1.3.4 A dedicated Investor Relations /Customer Services Team shall be in place to handle customer queries/service requests and complaints. The process shall be supervised by Investor Relations Officer.
 - 1.3.5 The AMC employees work in good faith and without prejudice, towards the interests of the Investors.

2. GRIEVANCE RAISING MECHANISM

- 2.1 The investors/unit holders can approach the AMC to register a complaint through any of the touch points mentioned below:
 - 2.1.1 **Contact Centre:** The investors can call our Investor Helpline number to be listed on website for on any business day between 9.00 am - 6.00 pm to provide feedback & register their queries and complaints.
 - 2.1.2 **Electronic Communication:** Investors can send an email to designated email to be listed on website. In case of further escalation, investors can write to the Investor Relations Officer.
 - 2.1.3 **Letter:** Investors can write about their query/complaint to the registered office/ corporate office of the AMC.

Write to us at: Client Services Abakkus Investment Managers Private Limited. Abakkus Corporate Centre, 9th Floor, Param House, Shanti Nagar, Off Santacruz Chembur Link Road, Santacruz (East), Mumbai – 400055

Website: Investors can also write to the AMC by accessing the customer feedback form available on the AMC website under the option “**Contact us**” on “**Home Page**”.

2.1.4 **Branch Office:** The investors can also during working hours approach the Branch Offices of the AMC to lodge their complaints.

2.1.5 **RTA:** Investors can write about their query/complaint to the corporate office of the Registrar and Transfer Agent appointed by the AMC.

2.1.6 **Contact via Investment Advisor /Distributor** - Communicate and escalate through distributor/investment advisor to AMC/RTA.

3. GRIEVANCE REDRESSAL PROCESS

3.1 The AMC shall endeavor to redress the Investor complaint(s) within 21 calendar days from the date of receipt of the complaint, as per the guidelines issued from time to time.

3.2 If the investors are not satisfied with the response from the AMC, they can lodge their grievances with SEBI at <https://scores.sebi.gov.in/> or may also write to any of the offices of SEBI or contact SEBI Office on Toll Free Helpline.

3.3 The AMC shall submit an Action Taken Report (“**ATR**”) on SCORES within 2calendar days as per the guidelines issued from time to time.

3.4 If the investor is not satisfied with the Redressal or no ATR has been filed within the above-mentioned days by the AMC, then the investor can opt for 1st review within 15 days. Thereafter, the complaint shall be escalated to Association of Mutual Funds in India (AMFI).

3.5 AMFI shall seek clarification from the AMC or the investor, as required. Once AMFI has received the clarification then they shall upload the revised ATR on SCORES within 10 days.

3.6 If the investor is not satisfied with the 1st review or ATR is not uploaded by AMFI in 10 days, then the investor can opt for 2nd review within 15 days. Thereafter, the complaint shall be escalated to supervising official or the dealing officer of SEBI and he shall seek clarifications from the AMC or the investor for the same.

3.7 If satisfied, SEBI shall dispose the complaint with reasonable closure remarks & if not satisfied, then SEBI shall advice the investor to opt for Online Dispute Resolution by registering the complaint on online Dispute resolution Portal (“**ODR Portal**”) at <https://smartodr.in/login>.

3.8 Alternatively, the investor can also directly initiate dispute resolution through the ODR Portal if the grievance lodged with the AMC is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.

3.9 The dispute resolution through the ODR Portal can be initiated when the complaint/ dispute is not under consideration at SCORES or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law.

3.10 The process on Online Dispute Resolution Mechanism shall be available on the AMC's website.

4. INTERNAL PROCESS AND ESCALATION MATRIX

The AMC shall endeavor to redress the investor complaint(s) within 21 calendar days from the date of receipt of the complaint as per the guidelines issued from time to time.

All the investor complaints are processed/monitored by the Investor Services Team.

The internal TAT for processing the complaints. In the event the internal TAT's are not adhered to, the following escalation is as follows:

<u>Particulars</u>	<u>TAT</u>	<u>Person Responsible</u>
All complaints shall be attended Investor services Team	T+3	
Escalation - Level 1		
All complaints which remain unresolved/attended to	Beyond T+3 upto T+7	Investor Relations Officer
Escalation - Level 2		
All complaints which remain unresolved/attended to	Beyond T+7 upto T+15	Head - RTA & Compliance Officer
Escalation - Level 3		
All complaints which remain unresolved/attended to	Beyond T+15	Chief Operations Officer

In addition to above, following reporting shall be provided to the Unit Holder Protection Committee pursuant to the requirements of the Unit Holder Protection Policy:

"The Committee shall review reports generated in relation to the UHP metrics at least once every six months, to assess trends, identify areas of concern, and recommend corrective or enhancement measures as deemed appropriate."

Unitholder Protection (UP) metrics - This matrix includes descriptions, measurement techniques, threshold levels, action plans, and responsible parties for each parameter as mentioned below.

5. TIME FRAME

- 5.1 Queries/Complaints are investigated within the stipulated timelines for handling queries/complaints received at the different levels of escalation.
- 5.2 Certain types of queries/complaints, involving fraud, legal inputs and third party (Other banks/Aggregator), needing more time for investigation, are acknowledged accordingly and the turnaround time is communicated to the investor.
- 5.3 The communication of the AMC's stand on any issue is important and is done clearly in an investor friendly manner.

6. SENSITIZING STAFF ON HANDLING COMPLAINTS (TRAINING)

- 6.1 The Investor Relations Team is specially trained for handling queries/complaints by trainers.
- 6.2 Training includes both operations and soft skills, as different Investors perceive and react differently to the aspects of complaint handling.
- 6.3 The staff is encouraged to have an open attitude towards service recovery and winning the Investor's confidence.

7. MAINTENANCE OF RECORDS

- 7.1 The Register (soft copy/hard copy) of investor complaints and grievance shall be maintained and updated with details of complaints and its resolution thereof with time taken for resolution and maintained for such period as prescribed by regulatory authority from time to time.
- 7.2 The soft copies/hard copies of the complaints received from the investor shall be preserved by the Investor Services team for future reference.
- 7.3 A detailed report of complaints received and resolved and reasons for delay if any for resolution shall be recorded.
- 7.4 The reports shall be placed at the meetings of the board of director of AMC and Trustees.
- 7.5 The Unitholders Protection Committee will independently review the process mechanism and provide insights to streamline the grievance resolution framework.

8. DISCLOSURE OF COMPLAINTS

The details of investor complaints/queries shall be disclosed on the AMC's website as well as on AMFI website on a monthly basis (by 7th of every month) as per SEBI (Mutual Funds) Regulations, 1996 and as per the guidelines issued from time to time.

9. REVIEW OF THE POLICY

All circulars/guidelines issued by the regulator or other statutory authorities and applicable to the Company will be reviewed by CEO, CRO, Compliance Officer, COO & IRO and policy will be suitably amended using version control mechanism. The Policy shall be reviewed annually and shall be placed to Board of AMC and Trustee Company for approvals, for any modifications.