

CUSTOMER COMPLAINT HANDLING AND GRIEVANCE REDRESSAL POLICY

HDFC CAPITAL ADVISORS LIMITED (IFSC BRANCH)

Version Control

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I. BACKGROUND

HDFC Capital Advisors Limited (IFSC branch) (“**HCAL**” or “**FME**”) is registered with the International Financial Services Centres Authority (“**IFSCA**”) as a Registered Fund Management Entity (Non-Retail) under the IFSCA (Fund Management) Regulations, 2025 and changes thereon time to time (“**FM Regulations**”).

To facilitate the regulatory framework for handling of complaints and redressal of grievances by regulated entities in the IFSC, IFSCA has issued a circular titled ‘Complaint Handling and Grievance Redressal by Regulated Entities in the IFSC’ dated December 02, 2024 and bearing reference no. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs (“**IFSCA Circular**”). The IFSCA Circular is applicable to all entities regulated by IFSCA dealing with customers other than their group entities. Thus, the IFSCA Circular applies to HCAL and in pursuance of the same, HCAL has formulated and adopted this Customer Complaint Handling and Grievance Redressal Policy (“**Policy**”).

II. OVERVIEW OF THE POLICY

In accordance with the IFSCA Circular, the FME has developed this Policy, which has been duly approved by its board of directors.

This Policy consists of mechanism for receiving, handling and redressal of complaints in a timely and transparent manner. It has been formulated with the objective of ensuring the prompt, fair, and effective resolution of investor grievances relating to the funds managed by the FME under the GIFT IFSC framework. It reflects the FME’s commitment to providing transparent and responsive investor services while upholding high standards of governance and compliance.

This Policy applies to all investor complaints or grievances received by THE FME in connection with the funds and schemes managed by it at GIFT IFSC, including all Alternative Investment Funds registered or to be registered under the FM Regulations.

III. ROLE OF COMPLIANCE OFFICER AND PRINCIPAL OFFICER

The Compliance Officer of the FME will ensure that handling and disposal of complaints by the FME are in accordance with the regulatory requirements specified by IFSCA.

The FM Regulations mandates the Principal Officer to periodically review the investor complaints received and ensure immediate redressal of the same by the FME.

For the purpose of this Policy, the Compliance Officer will be the Complaint Redressal Officer (“**CRO**”) responsible for handling of complaints received from investors. Additionally, Principal Officer will be Complaint Redressal Appellate Officer (“**CRAO**”) designated for handling appeals of investors against the decision taken by the Complaint Redressal Officer of the Fund.

IV. COMPLAINT HANDLING PROCEDURE

For the purposes of this Policy, a complaint refers to any expression of dissatisfaction by an investor or stakeholder regarding the FME's services or operations, excluding the matters listed in Section VII herein below. This dissatisfaction might arise from issues such as investment performance, transparency, communication, service issues, or specific interactions with the fund's representatives. Some of the incidents which may be considered as complaints include:

1. Investment strategy or mandate deviations
2. Delay or non-receipt of investor reports
3. Fee, expense or charge-related disputes
4. Subscription, redemption or distribution issues
5. Operational or service deficiencies
6. Conflict of interest concerns
7. Governance or fiduciary duty issues
8. Regulatory or compliance breaches
9. Misrepresentation or misleading disclosures
10. Mis-selling or improper communication
11. Data privacy or confidentiality breaches

This is the **Level 1** of the complaint handling procedure. Following are the steps for complaint handling procedure:

1. On receipt of a complaint, the CRO of the FME will make an assessment on the merits of the complaint
2. The complaint shall be acknowledged in-writing, within 3 working days of receipt, on acceptance of a complaint by the FME
3. In case of non-acceptance of a complaint, the FME will inform the complainant within 5 working days along with reasons for non-acceptance
4. The FME will examine and process the complaint in a fair, transparent, professional and impartial manner
5. The FME may ask for the additional information from the complainant while processing the complaint.
6. The FME will dispose of the complaint no later than 30 days of acceptance of complaint. In case of any delay beyond such period, the FME will give proper reasons/justifications for the same in writing.
7. The FME may either resolve the complaint or reject the complaint. In the event that the complaint is rejected, the FME will give reasons for rejection, in writing to the complainant.

For the purpose of transparency and integrity of the complaint handling mechanism, it will be ensured that in case the complaint is with respect to the matter in which CRO is involved, the complaint will be handled by another officer of the FME in an impartial manner.

Channel for Registering Grievances

The grievance will be received by the CRO on compliancefme@hdfccapital.com

V. GRIEVANCE HANDLING – APPEAL MECHANISM

The FME will have the appropriate appeal mechanism to resolve the complaints in case of dissatisfaction on account of resolution received from CRO in the above case. This appeal mechanism will be in line with the IFSCA Circular

This is **Level 2** of the complaint handling procedure. Following procedure will be followed in case of appeal mechanism:

1. If a complainant is not satisfied with the resolution provided by the FME or if the complaint has been rejected by the FME, the complainant may file an appeal before the CRAO of the FME within 21 days from the receipt of the decision from the CRO.
2. The CRAO will dispose of the Appeal within a period of 30 days.

VI. COMPLAINT TO THE IFSCA

This is **Level 3** of the complaint handling procedure. The complainant will also have the right to appeal to the IFSCA in case of dissatisfaction with respect to resolution provided by the CRAO of the FME. The complainant will file the appeal with the IFSCA through the email to grievance-redressal@ifsc.gov.in within 21 days from the receipt of the decision of the FME. or any other mechanism prescribed by IFSCA time to time.

However, the right to appeal to the IFSCA is permitted only If the complainant has exhausted the appellate mechanism of the FME.

VII. MATTERS NOT CONSIDERED AS COMPLAINTS

The IFSCA circular has prescribed some of the matters which will not be considered as 'complaint'. These matters have been listed below:

1. Anonymous complaints (except whistleblower complaints)
2. Incomplete or un-specific complaints
3. Allegations without supporting documents
4. Suggestions or seeking guidance/explanation
5. Complaints on matters not relating to the financial products or services provided by the FME
6. Complaints about any unregistered/ un-regulated activity
7. References in the nature of seeking information or clarifications about financial products or services

VIII. MAINTENANCE OF RECORDS

The FME will maintain all records relating to handling of complaints for the period of six years from the date of disposal of complaint in an electronic retrieval form, unless such other time period has been

mandated by the IFSCA under the applicable regulations, circulars, handbooks, guidelines etc., as issued from time to time.

These records will include the following:

1. Complaints received and processed
2. All correspondence exchanged between the FME and the complainants
3. All information and documents examined and relied upon by the FME while processing of the complaints
4. Outcome of the complaints
5. Reasons for rejection of complaints, if any
6. Timelines for processing of complaints
7. Data of all complaints handled by it.

In case of any pending litigation or legal proceeding relating to the complaint, the record will be maintained for the applicable period, after final disposal of the proceeding.

IX. REPORTING AND DISCLOSURE

This Policy is disclosed on the website of the FME or its parent entity under the heading “Complaint Handling and Grievance Redressal”. The name and contact details of the CRO and the CRAO has also been displayed under this section.

Additionally, the disclosure document of the scheme will also contain details pertaining to investor grievance redressal mechanism.

The FME will file reports on handling of complaints in the form and manner specified by the IFSCA from time to time.

The FME will have a section with heading “Complaint Handling and Grievance Redressal” in its Annual Report to be submitted to the IFSCA as prescribed under the FM Regulations. This section will provide data of all complaints received, resolved, rejected and pending during the year in a tabular/ graphical format.

X. REVIEW OF POLICY

The FME will review this Policy at least once a year, or earlier, in case it effects changes to the FME's business operations or on account of any changes to the applicable regulatory framework. The FME will ensure that any such changes to the Policy are approved by the Board of the FME and it will be published on its website.