

COMPLAINT HANDLING AND GRIEVANCE REDRESSAL POLICY

VERSION CONTROL

Sr. No.	Version No.	Date	Changes Incorporated	Prepared By	Reviewed By	Approved By
1	1.0	17-03-2025	Creation of the Policy document	Jay Kansara	Krishna Prasad Vittal	Governance Committee
2	2.0	01-10-2025	Changes in the CRO and CRAO	Jay Kansara	Nishanth Sekar	Governance Committee

CLIENT GRIEVANCE REDRESSAL POLICY

Preface

Unifi Investment Management LLP (UIML), being a service organization clearly understands that a high level of client/investor service and complete customer satisfaction is one of its key goals. UIML believes that providing prompt and efficient service is essential not only to retain existing clients but also goes a long way in acquiring new relationships.

Objective

This policy outlines the framework for handling and resolving complaints and grievances in a transparent, fair, timely and efficient manner through adequate review mechanisms. This policy aims at minimizing instances of clients'/investors' complaints by ensuring the highest level of service delivery. It also aims to ensure compliance with applicable regulations and fosters trust and confidence among clients/investors.

Scope

This policy encompasses all complaints submitted by clients or investors concerning the services or activities of UIML.

Definitions

Clients/Investors: The term "Clients/Investors" shall refer to and include all the clients or investors concerning the services or activities of UIML For convenience, the term "Clients/Investors" also encompasses clients of the product(s) or scheme(s) that have been or will be launched by UIML.

Complaint: Any written expression of dissatisfaction about the Entity's/Fund's services, products, or conduct except for the complaints mentioned in Schedule-1.

Complainant: Clients/Investors lodging the complaint.

Redressal: Actions taken to resolve the complaint and provide relief to the complainant.

Guiding Principles

This policy is prepared on the guiding principles as outlined below:

- (i) Transparency: Clear communication on how complaints are handled.
- (ii) Fairness: Treating all complainants equitably and without bias.
- (iii) Confidentiality: Ensuring all complaints are handled confidentially to protect the complainant's identity.
- (iv) Timeliness: Prompt acknowledgement, investigation, and resolution of complaints.
- (v) Compliance: Adhering to regulatory requirements and industry standards.

Procedure

UIML has built a structured system towards ensuring just and fair redressal within rules and regulations applicable to the firm's operations. Such rules are also in accordance with the circular issued by the International Financial Services Centres Authority (IFSCA) on Complaint Handling and Grievance Redressal

For the purpose of Complaint Handling and Grievance Redressal and in accordance with the guidelines issued by IFSCA, UIML has appointed the following persons as Complaint Redressal Officer (CRO) and Complaint Redressal Appellate Officer (CRAO):

Complaint Redressal Officer (CRO)	Shivashish Singh	grievance@unifiinvestment.com
Complaint Redressal Appellate Officer (CRAO)	Jay Kansara	jay@unifiinvestment.com

-Receipt of Complaints

For the purpose of making a complaint, all the aggrieved clients/investors shall formally write an e-mail from their registered e-mail to grievance@unifiinvestment.com.

-Acknowledgment of Complaints

On receipt of a complaint, the CRO shall assess its merits. Pursuant to this assessment, the CRO may or may not accept a complaint.

In case of acceptance, the CRO shall acknowledge acceptance, in writing, within 3 working days of receipt of the complaint.

In case of non-acceptance or rejection, the CRO shall inform the complainant within 5 working days along with reasons in writing.

Provided that, where the CRO is or was involved in the conduct of the financial transaction, which is the subject matter of the complaint, the complaint shall be handled by another officer designated by UIML, in a fair and impartial manner.

-Redressal Mechanism

CRO shall dispose of the complaint within 30 working days of acceptance of the complaint. CRO to ensure that appropriate remedies are offered and corrective actions are implemented. CRO may ask for additional information from the complainant while processing the complaint.

-Escalation or Appeal

If a complainant is not satisfied with the resolution provided by the CRO or if the complaint has been rejected by the CRO, the complainant may file an appeal before the CRAO preferably within 21 working days from the receipt of the decision from the CRO.

The CRAO, on receipt of the complaint, shall dispose of the Appeal within a period of 30 working days.

-Complaint to IFSCA

Where a complainant is not satisfied with the decision of UIML and has exhausted the appellate mechanism, the Customer or Clients may file a complaint before the Authority through email to grievance-redressal@ifsc.gov.in preferably within 21 working days from the receipt of the decision from UIML.

-Closure of Complaints

A complaint is considered closed when the complainant indicates satisfaction with the resolution or if no further response is received within 30 working days of the proposed resolution. Closure of complaints by UIML will be communicated in writing to the Clients/Investors.

Maintenance of Records

A grievances register shall be maintained by the Compliance Officer at the registered office. All complaints received shall be entered into the complaints register. The Complaint register shall contain the details of:

1. Complaints received and processed;
2. Timelines for processing/resolving complaints;
3. Outcome of the complaints;
4. Details of action taken, date of closure and time taken for solving each complaint;
5. Reasons for rejection of complaints, if any.

UIML shall also maintain the following records for at least six years from the date of disposal of the complaint. In case of any pending litigation or legal proceeding relating to the complaint, the following records shall be maintained for six years, after the final disposal of the proceeding:

1. All correspondence exchanged between the Entity/Fund and the complainants;
2. All information and documents examined and relied upon by the Entity/Fund while processing the complaints.

Reporting Requirements

The number of complaints received, solved, rejected or pending shall be reported to the IFSCA in the quarterly compliance report furnished by UIML.

The complaint register shall also be placed before UIML's Governance Committee.

In cases of complaints related to the Scheme(s)/Fund(s), the Annual Financial Statements of the Fund(s) shall have a separate section with the heading "Complaint Handling and Grievance Redressal". The section shall also provide data on all complaints received, resolved, rejected and pending during the year in a tabular/graphical format.

In case of complaints related to UIML, the website of UIML shall have a separate section with the heading "Complaint Handling and Grievance Redressal. The section shall also provide data



on all complaints received, resolved, rejected and pending during the year in a tabular/graphical format.

Training to Employees

By nature, being a sensitive subject, UIML shall adequately train all its customer-facing staff members in handling and resolving customer/client queries/grievances/complaints.

Responsibility of the Compliance Officer

The Compliance Officer shall ensure that the handling and disposal of complaints by CRO/CRAO are in accordance with the regulatory requirements specified by IFSCA.

Review of the Policy

This policy will be reviewed annually by the Governance Committee to incorporate changes in regulations, industry practices, or operational requirements.

Regulatory Reference

The policy complies with Complaint Handling and Grievance Redressal guidelines issued by the International Financial Services Centres Authority (IFSCA).

Availability

This Policy document shall always be available on www.unifiinvestment.com.

Contact Details

For further assistance, please drop a mail to: grievance@unifiinvestment.com.

Schedule-1

- Anonymous complaints (except whistleblower complaints);
- Incomplete or unspecific complaints;
- Suggestions or seeking guidance/explanation;
- Complaints on matters not relating to the financial products or services provided by Entity/Fund;
- References in the nature of seeking information or clarifications about financial products or services.