



Complaint Handling and Grievance Redressal Policy

Introduction

India SME Investments (“India SME” or “the Fund”) strives to meet the long-term objectives of its stakeholders through superior service, transparency, and operational efficiency.

This **Complaint Handling and Grievance Redressal Policy** ensures timely and effective resolution of client complaints while driving continuous improvement in client service and investment management processes.

1. Policy Objectives

The key objectives of this policy are to:

- Provide a transparent mechanism for timely resolution of client complaints and queries.
- Involve all stakeholders in monitoring complaint resolution.
- Continuously enhance client experience, processes, and fund management practices.
- Ensure distributors escalate client complaints and queries promptly.
- Promote client awareness on how to reach out directly or through distributors for resolution.

2. Appointment of Officers and Committee

- Any one of the **Designated Partners** shall be appointed as the **Complaint Redressal Appellate Officer (CRAO)**.
- The **Compliance Officer** shall be appointed as the **Complaint Redressal Officer (CRO)**.
- The **Grievance Redressal Committee**, headed by the CRAO, shall include the CRO, Group Head – Compliance, and the Chief Executive Officer of the parent entity.
- The CRO shall manage all complaints received directly from clients or through distributors.
- All complaints shall be reviewed by the Grievance Redressal Committee to ensure fair and impartial handling.

3. Redressal Mechanism for Clients

Clients may register complaints through the following process:

Step 1 – Contact the Complaint Redressal Officer (CRO):

Name: Mr. Adit Dawda

Address: Office No. SI-G-026, Shilp Incubation Centre, Plot 11T 3 & 11T 5, Block-11, GIFT SEZ, GIFT City, Gandhinagar - 382355

Phone: +91 98204 62721

Email: officer.giftcity@indiasmeinvestments.com

Step 2 – Escalation to Appellate Officer (CRAO):

If unsatisfied with the response, clients may escalate the issue with all relevant details to adit@indiasmeinvestments.com.

Step 3 – Regulatory Escalation:

If still unresolved, clients may approach **International Financial Services Centres Authority (IFSCA)** at grievance-redressal@ifsca.gov.in within **21 days** of receipt of the previous response.

This policy, along with contact details of the CRO and CRAO, shall be displayed prominently on India SME's website under the section “*Complaint Handling and Grievance Redressal*.”

4. Timelines for Response

India SME will endeavour to respond to all client complaints within **7 working days** of receipt. In case of delay, the client will be informed of the status and expected resolution time.

5. Distributor Responsibilities

- Distributor agreements shall include a clause requiring prompt escalation of all client complaints and queries to India SME.
- Business teams shall reiterate this responsibility during fund launch events and training sessions.
- Distributors must share with India SME the list of complaints received from their clients that relate to India SME-managed funds.



6. Type of Clients Eligible to Raise Complaints

- **Direct Clients:** Complaints received directly from clients shall be escalated to the Grievance Redressal Committee.
- **Distributor Clients:**
 - *Direct Route:* Clients onboarded directly under distributor facilitation are handled as direct clients.
 - *Omnibus Route:* Where investments are made via pooled accounts, the distributor remains responsible for complaint resolution, keeping India SME informed of issues impacting its reputation.

7. Classification and Scope of Complaints

Covered Complaints:

- Misrepresentation, inadequate disclosure, or inappropriate advice.
- Breach of confidentiality or misuse of client data.
- Fraud, dishonesty, or non-compliance by service providers.
- Any violation of regulatory requirements.

Excluded from Scope:

- Anonymous or incomplete complaints (except whistleblower cases).
- Unsubstantiated allegations or requests for information.
- Matters unrelated to India SME's regulated activities.
- General queries or clarifications.

Routine client queries regarding fund information, administration, or operational services shall be tracked but not treated as formal complaints.

8. Record Maintenance

India SME shall maintain electronic records of all complaints, including:

- Details of complaints received, processed, and resolved.
- Correspondence, documents, and final outcomes.
- Reasons for rejection, if applicable.

Records shall be retained for **six years** from the date of disposal, or longer if litigation is pending.

9. Reporting

India SME shall:

- Submit periodic reports on complaint handling as prescribed under applicable regulations.
- Disclose aggregate complaint data in its **Annual Report**.

Annexure A – Grievance Redressal Mechanism

Particulars	Person Responsible	Timeline
Forward complaint to Grievance Committee	Complaint recipient	Real-time
Acknowledge complaint to client	CRO	Real-time
Inform client in case of non-acceptance	CRO	Within 7 working days
Mark complaint to functional head & committee	CRO	Real-time
Provide response to client	CRAO	Within 7 working days
Update client on delay & expected resolution	CRO	Within 7 business days
Keep client informed of progress	CRO	Within 15 business days
Final closure of complaint	CRO	Within 30 working days
Review complaint status at Board level	CRAO	Periodically
Advise client on further regulatory steps if unresolved	CRO	As applicable

India SME Investments Fund I, (a scheme of India SME Investments Trust) is registered with SEBI as a Category II Alternative Investment Fund with effect from 30 March 2019 with the Registration Number IN/AIF2/18-19/0664. The registered office of the Fund is Birla Centurion, 2nd Floor, PB Marg, Worli, Mumbai - 400030. **India SME Investments LLP** is the Investment Manager, **Axis Trustee Services Ltd** is the Trustee and. **India SME Investments LLP** is the Sponsor to the Fund.

At **India SME Investments Fund I**, investor satisfaction is our foremost agenda. In case of any grievance or complaint:

- 1) Please contact our compliance officer **Adit Harshad Dawda** with email id adit@indiasmeinvestments.com and phone no +91 22 4973 5906.
- 2) You may also approach **Mitin Chandanmal Jain** with email id mitin@indiasmeinvestments.com and phone no +91 22 4973 5906.
- 3) In case you are not satisfied with our response you can lodge your grievance 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.
- 4) In case you are still not satisfied with the resolution through SCORES portal, you can initiate the dispute resolution through ODR portal at <https://smartodr.in/login> .

Note: The dispute resolution through ODR will not be possible, if

- a. The complaint or grievance is not raised with the compliance officer first and subsequently on the SCORES portal.
- b. Dispute raised is pending before any arbitral process or court or tribunal.
- c. Dispute is non arbitrable in terms of Indian Law.
- d. Dispute is time barred in terms of law of limitation.

India SME Investments Fund II, (a scheme of India SME Investments AIF Trust II) is registered with SEBI as a Category II Alternative Investment Fund with effect from 23 January 2024 with the Registration Number IN/AIF2/23-24/1433. The registered office of the Fund is Kingston Tower, 8th Floor, Flat No. 802, G.D. Ambekar Marg, Tank Road, Mumbai, Maharashtra (IN-MH), 400012, India. **Mathesis Investment Advisors LLP** is the Investment Manager, **Axis Trustee Services Ltd** is the Trustee and **Mathesis Ventures LLP** is the Sponsor to the Fund.

At **India SME Investments Fund II**, investor satisfaction is our foremost agenda. In case of any grievance or complaint:

- 1) Please contact our compliance officer **Adit Harshad Dawda** with email id adit@indiasmeinvestments.com and phone no +91 22 4973 5906.
- 2) You may also approach **Mitin Chandanmal Jain** with email id mitin@indiasmeinvestments.com and phone no +91 22 4973 5906.
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