Ascertis GC (IFSC) Private Limited

GRIEVANCE REDRESSAL POLICY

Investment Manager: Ascertis GC (IFSC) Private Limited
Funds: Ascertis Credit GC Fund IV

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Executive Summary

Brief Overview	The Grievance Redressal Policy of Ascertis GC (IFSC) Private Limited establishes a robust, structured, and transparent framework for the effective handling and resolution of complaints and grievances raised by stakeholders, including investors, clients, and other associated entities. This Policy reflects the Investment Manager's commitment to upholding the highest standards of fairness, integrity, and accountability in its operations. It has been designed to ensure a consistent, efficient, and time-bound approach to grievance resolution, while strictly adhering to the regulatory requirements and best practices prescribed by the International Financial Services Centres Authority (IFSCA). By embedding customer-centric principles and clear escalation mechanisms within its framework, the Policy aims to enhance stakeholder confidence, promote transparency, and strengthen trust in the organization's governance processes. It further supports the overarching objective of maintaining a sound, responsive, and compliant financial ecosystem in line with global standards and IFSCA guidelines
Version	1.0

Approval Details

Authority	Version	Approval Date
Board of Director	1.0	June 30, 2025

Contents

1. INTRODUCTION 4

2. DEFINITION 4

3. COMPLAINTS HANDLING PROCEDURE 5

4. INDICATIVE LIST OF WHAT IS NOT TREATED AS A COMPLAINT 6

5. APPEAL MECHANISM 6

6. COMPLIANT/APPEAL BEFORE THE AUTHORITY ("IFSCA") 6

7. MAINTENANCE OF RECORDS 7

8. REVIEW 7

1. INTRODUCTION

The purpose of this Grievance Redressal Policy is to establish a structured and comprehensive framework for addressing and resolving complaints and grievances from stakeholders, including investors, clients, and other entities associated with **Ascertis Credit GC Fund IV** (the "Funds") managed by **Ascertis GC (IFSC) Private Limited** (the "Investment Manager").

This policy aims to ensure fairness, transparency, and accountability in grievance handling while maintaining compliance with the International Financial Services Centres Authority (IFSCA) guidelines and other applicable regulations. It promotes trust and integrity within the financial ecosystem by providing clear protocols for grievance registration, investigation, resolution, and escalation.

Through this policy, the Company seeks to enhance stakeholder satisfaction, mitigate risks, and foster a culture of continuous improvement in service quality and operational efficiency, thereby aligning with the strategic objectives and expectations of the Funds and their stakeholders.

2. Definition:

a) "Complaint means a representation in writing or through electronic means containing aggrievance alleging deficiency in services on part of **Ascertis GC (IFSC) Private Limited,** an employee, or **Ascertis GC (IFSC) Private Limited** vendor (third party or partner that **Ascertis GC (IFSC) Private Limited** may have tied up with for delivering services)"

b) "Complaint Redressal Appellate Officer" or "CRAO" shall be Director of Ascertis **GC (IFSC) Private Limited** for handling appeals of consumers against the decision taken by the Complaint Redressal Officer of the **Ascertis GC (IFSC) Private Limited**;

c) "Complaint Redressal Officer" or "CRO" shall be Compliance Officer of Ascertis GC (IFSC) Private Limited, responsible for handling of complaints received from its consumers;

d) Customer" or "Client" shall mean a person who is engaged in a financial transaction or activity with Ascertis GC (IFSC) Private Limited or Funds being managed/ to be managed by Ascertis GC (IFSC) Private Limited and includes a person on whose behalf the person engaged in the transaction or activity, is acting.

3. Complaints Handling Procedure:

1. Any Customer/ stakeholder who wish to file any complaint or grievance with **Ascertis GC (IFSC) Private Limited** can send an email to giftcity@ascertiscredit.com or write a letter to the registered office of the Company.

2. The email/letter should clearly mention the full facts of the complaint or grievance for IFSC to check, investigate and respond to the complainant.

3. On receipt of a complaint, CRO shall assess the merits of the complaint. Pursuant to assessment,
   i) In case of acceptance, The Company shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
   ii) In case of non-acceptance, The Company shall inform the complainant within 5 working days along with reasons.
4. The Company shall examine and process the complaint in a fair, transparent, professional and impartial manner.

5. 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 the CRAO, in a fair and impartial manner.

6. The Company may seek such additional information from the complainant, as maybe necessary to review and process the complaint.

7. Upon receipt of such additional information in a timely manner, The Company shall dispose of the complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint.

8. Resolution of the complaint or rejection with reason for rejection would be communicated to the complainant in writing by email / letter.

4. Indicative list of what is not treated as a complaint:

1. Anonymous complaints (except whistleblower complaints),

2. Incomplete or unspecific 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 Company

6. Complaints about any unregistered/ unregulated activity

7. References in the nature of seeking information or clarifications about financial products or services

8. Any other matters may be decided by the Company depending on the facts and circumstances of the case from time.

5. Appeal Mechanism

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

2. The CRAO shall dispose of the Appeal within a period of 30 days.

6. Compliant/Appeal before the Authority ("IFSCA"):

Where a complainant is not satisfied with the decision provided by CRO and CRAO of the Company, they may file a complaint with IFSCA through email to grievance-redressal@ifsca.gov.in preferably within 21 days from the receipt of the decision from the Company

7. Maintenance of Records:

The Company shall maintain comprehensive and accurate records pertaining to the receipt, handling, investigation, and resolution of complaints, including, but not limited to, the following:

- Details of all complaints received and processed;
- All correspondence and communications exchanged between the Company and the complainants;
- Information, documents, evidence, and records reviewed or relied upon during the complaint handling process;
- The final outcome and resolution of each complaint;
- Reasons for rejection, closure, or non-admission of complaints, where applicable;
- All such records shall be maintained in an electronic and retrievable format for the period prescribed by the Authority under the applicable laws, regulations, circulars, guidelines, handbooks, directions, or other regulatory requirements, as may be amended from time to time.
- Provided that, where no specific retention period has been prescribed by the Authority or any applicable regulatory framework, such records shall be preserved for a minimum period of six (6) years from the date of final disposal or closure of the complaint.
- Provided further that, where a complaint is subject to any litigation, arbitration, investigation, inquiry, regulatory proceeding, or other legal process, the relevant records shall be retained until the conclusion of such proceedings and thereafter for such additional period as may be required under applicable law, notwithstanding the retention period specified above.

8. Review

The policy shall be reviewed by Board Directors of the Company on periodic basis and necessary changes, regulatory or otherwise, shall be carried out and updated in the said policy.