

TG INVESTMENT MANAGERS IFSC LLP

COMPLAINT HANDLING AND GRIEVANCE REDRESSAL POLICY

1. INTRODUCTION

- 1.1 Investor service is a critical element of the business of TG Investment Managers IFSC LLP registered as an Authorized Fund Management Entity bearing registration number FDM2025FUM0847 with the International Financial Services Centres Authority under the International Financial Services Centres Authority (Fund Management) Regulations, 2025 (“FME”). The FME acts as the fund management entity of Together Fund II IFSC, a Venture Capital Scheme registered with the IFSCA as a Category I Alternative Investment Fund (the “Fund”). The FME is committed to ensuring that investors receive prompt, fair and efficient service throughout the lifecycle of their investment.
- 1.2 This Complaint Handling and Grievance Redressal Policy ("**Policy**") is adopted in pursuance to the IFSCA circular titled ‘*Complaint Handling and Grievance Redressal by Regulated Entities in IFSC*’ dated December 2, 2024, which provides for regulatory framework for handling of complaints and redressal of grievances by the regulated entities in the International Financial Services Centre (“IFSC”). This policy establishes a structured framework for handling complaints and grievances received from investor(s), clients (s), customer(s), consumer(s) and other eligible stakeholders by the FME in accordance with the applicable laws, regulations, circulars, directions and guidelines issued by the IFSCA from time to time.
- 1.3 The FME has put in place, this Policy and has appointed Shubham Gupta as its Complaint Redressal Officer and Manav Garg Complaint Redressal Appellate Officer as the (as defined below) for ensuring compliance with the Policy.
- 1.4 This Policy lays down the key responsibilities, grievance redressal framework, reporting/disclosure requirements, record-keeping, and the dispute resolution mechanism that the FME will adhere to in the event of an investor grievance/ complaint being raised.
- 1.5 This Policy is intended solely to establish an internal grievance redressal mechanism and does not create contractual rights in favour of any third party.

2. DEFINITIONS

- 2.1. “**Complaint**” means a formal written communication submitted by an investor of the Fund or any person acting for or on behalf of an investor of the Fund, alleging a grievance or dissatisfaction regarding an act or omission by the Fund or a deviation by the Fund from the terms set forth in its Private Placement Memorandum or other governing Fund documents.

The following shall not constitute a Complaint under this Policy:

- i. Anonymous complaints (other than whistleblower complaints, where applicable);
- ii. Incomplete or un-specific complaints;
- iii. Allegations without supporting documents;
- iv. Suggestions or seeking guidance/explanation
- v. Complaints about any unregistered/ un-regulated activity

TG INVESTMENT MANAGERS IFSC LLP

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- vi. Requests for information, clarification or guidance;
- vii. Complaints unrelated to the financial products or services provided by the Fund or FME;
- 2.2. **“Complaint Redressal Officer” (“CRO”)** shall be an employee of the FME responsible for handling of complaints received from the investors of the Fund.
- 2.3. **“Complaint Redressal Appellate Officer” (“CRAO”)** shall be a senior level employee of the FME responsible for handling the appeals of consumers against the decision taken by the CRO of the FME;
- 2.4. **“Consumer”** shall have the same meaning as assigned to “Client” or “Customer” under clause 1.3.11 of the IFSCA (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines, 2022;
- 2.5. **“Investor”** means any person who has entered into a duly executed contribution agreement or other equivalent subscription or investment document with the Fund for the purpose of making an investment in the Fund and whose investment has been accepted by the Fund in accordance with the terms of the Fund Documents.

3. OBLIGATIONS OF THE FME AND THE CRO

The FME and CRO shall:

- endeavour to resolve complaints promptly, fairly and transparently within the timelines prescribed under this Policy;
- designate appropriate personnel responsible for complaint handling and grievance redressal;
- ensure complaints are handled impartially, professionally and confidentially;
- keep complainants appropriately informed regarding the status of their complaints;
- maintain confidentiality and privacy of investors;
- Comply with reporting/disclosure requirements as prescribed by IFSCA from time to time for the purpose of grievance redressal;
- examine every complaint objectively and provide a reasoned response; and
- publish this Policy on its website (or on the Together Fund website, if applicable), together with the names and contact details of the Complaint Redressal Officer (“CRO”) and Complaint Redressal Appellate Officer (“CRAO”).

4. GRIEVANCE REDRESSAL MECHANISM

4.1 Filing of a Complaint with the FME

- a) An investor who wishes to lodge a Complaint may submit the Complaint in writing through any of the following modes:

Email:	shubg@together.fund ; principal.ifsc@together.fund
Letter / Post:	Attention: Complaint Redressal Officer TG Investment Managers IFSC LLP Unit No. 52, The Platform, Ground Floor, 11 T2, Block 11 GIFT SEZ, GIFT City, Gandhinagar – 382355, Gujarat
Complaint Redressal Appellate	Name: Manav Garg Email: manav@together.fund Attention: Complaint Redressal Appellate Officer

Officer (CRAO)	TG Investment Managers IFSC LLP Unit No. 52, The Platform, Ground Floor, 11 T2, Block 11 GIFT SEZ, GIFT City, Gandhinagar – 382355, Gujarat
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- b) Acknowledgment: Upon receipt of a communication, the CRO shall assess the Complaint and acknowledge the receipt of the Complaint within 3 working days of the receipt of the Complaint;
- c) Acceptance or Rejection:
 - a. Accepted Complaints: If the communication received by the CRO falls within the definition of Complaint, the CRO will notify the Complainant of the acceptance of the Complaint within 5 working days of the receipt of the Complaint.
 - b. Rejected communication: Where the communication received does not fall within the definition of a Complaint, it shall be rejected and the CRO shall communicate the reasons for rejection within 5 working days of the receipt of the Complaint along with the reasons for such rejection.
- d) The CRO may request additional information or supporting documents from the complainant, where necessary.
- e) Where the CRO is directly involved in the matter forming the subject of the Complaint, the Complaint shall be handled by another appropriately designated officer of the FME to ensure independence and impartiality.
- f) The FME shall endeavour to resolve every accepted Complaint within 15 days of the receipt of the Complaint, and in any event no later than 30 days from the date of acceptance of the Complaint.

4.2 Internal Appellate Mechanism

- a) If the complainant is dissatisfied with the resolution provided by the CRO or if the Complaint has been rejected, the complainant may file an appeal before the CRAO within 21 days of receiving the CRO's decision / communication, as the case may be.
- b) The appeal may be submitted through:

Complaint Redressal Appellate Officer (CRAO)	Name: Manav Garg
	Email: manav@together.fund
	Attention: Complaint Redressal Appellate Officer TG Investment Managers IFSC LLP Unit No. 52, The Platform, Ground Floor, 11 T2, Block 11 GIFT SEZ, GIFT City, Gandhinagar – 382355, Gujarat

- c) Upon receipt of the appeal, the CRAO shall send an acknowledgement to the Complainant about the receipt of the appeal within 3 working days from the date of receipt of the appeal.
- d) The CRAO shall dispose of the appeal within 30 days of receipt.

4.3 Complaint before IFSCA

Where the complainant remains dissatisfied after exhausting the FME's internal grievance redressal mechanism, the complainant may file a Complaint with the IFSCA, preferably within 21 days of the receipt of the communication by the CRAO, by sending an email at grievance-redressal@ifsc.gov.in

5. RECORD KEEPING

The FME shall maintain records of handling of Complaints, including:

- a) Complaints received and processed;
- b) All correspondence exchanged between the Regulated Entity and the complainants;
- c) All information and documents examined and relied upon by the Regulated Entity while processing of the complaints;
- d) Outcome of the complaints;
- e) Reasons for rejection of complaints, if any;
- f) Timelines for processing of complaints; and
- g) Data of all complaints handled by it.

The FME shall maintain the records in electronic retrieval form for such period as may be prescribed under applicable law.

6. REVIEW OF POLICY

This Policy shall be reviewed periodically and updated from time to time to ensure compliance with applicable laws. . Any amendments shall be approved by the board of the FME.

The FME shall report the data of all complaints received, resolved, rejected and pending during the year in a tabular /graphical format under the section “Compliant handling and Grievance Redressal” in its Annual report or display the said information on its website or dedicated webpage, as applicable.

7. CONFLICT

In the event of any conflict between this Policy and the applicable laws, the applicable laws shall prevail.

8. EFFECTIVE DATE

This Policy shall come into effect from 1 November 2025 and shall remain in force until amended or replaced by the FME.

9. CONTACT DETAILS

The details of the designated persons under this Policy:

Complaint Redressal Officer (CRO)	Name: Shubham Gupta
	Email: shubg@together.fund ; principal.ifsc@together.fund ;
	Address: TG Investment Managers IFSC LLP Unit No. 52, The Platform, Ground Floor, 11 T2, Block 11, GIFT SEZ, GIFT City, Gandhinagar – 382355, Gujarat
Complaint Redressal Appellate Officer (CRAO)	Name: Manav Garg
	Email: manav@together.fund
	Address: TG Investment Managers IFSC LLP Unit No. 52, The Platform, Ground Floor, 11 T2, Block 11, GIFT SEZ, GIFT City, Gandhinagar – 382355, Gujarat
IFSCA	International Financial Services Centres Authority
	Email: grievance-redressal@ifsc.gov.in