

COMPLAINT HANDLING AND GRIEVANCE REDRESSAL POLICY

1. INTRODUCTION

- 1.1. Investor service is a vital element for sustained business growth, and it will be the aim of Northpoint Investment Management (IFSC) LLP (“**Manager**”) to ensure that the investors of Northpoint Capital Emerging Sectors GIFT Fund I (“**Fund**”) receive exemplary service across different touch points of the Fund cycle. Prompt and efficient service is essential for retaining existing relationships and therefore investor satisfaction becomes critical.
- 1.2. This policy (“**Policy**”) details grievance handling through a structured grievance redressal framework. Grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in the future.
- 1.3. A complaint includes a formal written communication submitted by an investor, reporting an identifiable harm, deprivation of a right, loss suffered by such investor on account of an action or an omission on the part of the Fund and/or the Manager, contrary to the duties and obligations of the Manager and/or the Fund under Applicable Law or in its fiduciary capacity. It also includes allegations such as failure to disclose conflicts of interest, misrepresentations, etc. and complaints regarding discriminatory treatment among various classes of unit holders, distribution of units etc. (“**Complaint**”). However, the following instances will not be considered as a complaint:
 - (a) Anonymous complaints (except whistleblower complaints);
 - (b) Incomplete or un-specific complaints;
 - (c) Allegations without supporting documents;
 - (d) Suggestions or seeking guidance/explanation;
 - (e) Complaints on matters not relating to the financial products or services provided by the Funds;
 - (f) Complaints about any unregistered/ unregulated activity; and
 - (g) References in the nature of seeking information or clarifications about financial products or services.
- 1.4. This Policy is not intended to create third party rights or duties, nor is it intended to form part of any contract between the Manager and any investor in the Fund.

2. OBLIGATIONS OF THE MANAGER

- 2.1. The Manager will endeavor to address grievances or complaints of investors in a swift and effective manner within the timelines prescribed under this Policy. It will also aim to prevent the occurrence of similar grievances in the future.
- 2.2. The Manager will ensure that appropriate personnel are designated for grievance redressal in accordance with Applicable Law and resources are dedicated for redressal of complaints, issues and queries in a timely manner. Specifically, grievance redressal will be geared towards achieving the following outcomes:

- (a) Investors are treated fairly and in an impartial manner, reasonably, and justly at all times;
- (b) Complaints and grievances of investors are dealt with courteously and every attempt is made to resolve issues in a time-bound manner;
- (c) Confidentiality and privacy is always maintained and complaints are dealt with utmost professionalism;
- (d) The investor is periodically informed about the status and actions taken in respect of its complaint.
- (e) The Complaint is examined and processed in a fair, transparent, professional and impartial manner.
- (f) The Manager will ensure that this Policy is prominently disclosed on its website or on a dedicated webpage of its Group Entity, under the heading “**Complaint Handling and Grievance Redressal**”. The name and contact details of the complaint redressal officer and the complaint redressal appellate officer shall also be prominently displayed under this section.

3. GRIEVANCE REDRESSAL MECHANISM

3.1. Complaint with Manager

- (a) Complaints arise due to lack of understanding, or a deficiency of service experienced by investors. Deficiency of service may inter alia include lack of explanation, clarifications, understanding which escalates into shortfalls in the expected delivery standards, either due to inadequacy of facilities available or through the attitude of staff towards investors. Investors can seek clarification to their query and are further entitled to make a Complaint in writing in a manner set out herein.
- (b) The investor can contact the complaint redressal officer (“**CRO**”), appointed for the purposes of immediate redressal of Complaint of investors, to lodge a Complaint through the following modes:
 - (i) Email: Investors can send an email to co.gift@northpointcapm.com.
 - (ii) Letter: Investors can write to the Manager with their Complaint at the registered office address as mentioned here:

ATTN: Parth Soni, Complaint Redressal Officer
Unit No. FF 01, Pragya Accelerator, Block 15T, Road 11, Zone 1,
Processing Area GIFT SEZ, GIFT City, Gandhinagar – 382 355, Gujarat,
India
- (c) Upon receipt of a Complaint, the CRO shall assess the merits of the Complaint and pursuant to the assessment of the Complaint, acknowledge the Complaint in writing within the timeline as set out below:
 - (i) In case of acceptance of Complaint: within 3 (three) working days of the receipt of the Complaint; and

- (ii) In case of non-acceptance of Complaint: within 5 (five) working days along with reasons for rejection of Complaint in writing.
- (d) The CRO may ask for additional information from the investor while processing the Complaint.
- (e) Where the CRO is or was involved in the conduct which is the subject matter of the complaint, the complaint shall be handled by another officer designated by the Manager at the relevant time, in a fair and impartial manner.
- (f) Complaints received shall be disposed off within 15 (fifteen) days and but no later than 30 (thirty) days of acceptance of the Complaint.

3.2. Appeal Mechanism:

- (a) The complainant, if not satisfied with the resolution provided by the CRO or if the complaint has been rejected by the CRO, may file an appeal before the complaint redressal appellate officer (“**CRAO**”) within 21 (twenty-one) days from the receipt of the decision of the CRO. The CRAO shall be a senior level person of the Manager designated for handling appeals of investors against the decision of the CRO.
- (b) The complainant can contact the CRAO for the purpose of redressal of the complaint through the following modes:
 - (i) Email: Investors can send an email to po.gift@northpointcapm.com.
 - (ii) Letter: Investors can write to the Manager with their Complaint at the registered office address as mentioned here:

ATTN: Apurv Parikh, Complaint Redressal Appellate Officer
Unit No. FF 01, Pragya Accelerator, Block 15T, Road 11, Zone 1,
Processing Area GIFT SEZ, GIFT City, Gandhinagar – 382 355, Gujarat,
India
- (c) The CRAO shall dispose the appeal within 30 (thirty) days.

3.3. Complaint before the Authority:

- (a) If a complainant remains dissatisfied with the decision of the CRO and has exhausted the internal appellate mechanism provided by the Manager, the complainant may file a Complaint before the IFSCA through an email to grievance-redressal@ifsc.gov.in preferably within 21 (twenty one) days of the decisions of the CRAO.