

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 Financial Services LLP (“**Investment Manager**”) to ensure that the investors of Northpoint Capital Emerging Sectors Fund (“**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 grievance redressal 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. Grievances include allegations such as failure to fulfil obligations under the Fund Documents, misrepresentations, etc. and complaints regarding processing of drawdown transactions, discriminatory treatment among various classes of unit holders, distribution of units etc. General feedback, queries/clarifications received from the investors of the Fund from time to time will not be considered as instances of complaint or grievance.
- 1.3. This Policy is not intended to create third party rights or duties, nor is it intended to form part of any contract between the Investment Manager and any investor in the Fund.

2. OBLIGATIONS OF THE INVESTMENT MANAGER

- 2.1. The Investment Manager will ensure that appropriate resources are dedicated for redressal of issues and queries in a timely manner. Specifically, grievance redressal will be geared towards achieving the following outcomes:
 - (a) The Fund’s investors are treated fairly, reasonably, and justly at all times;
 - (b) Complaints and grievances of the Fund’s investors are dealt with courteously and necessary effort is made to resolve issues in a time-bound manner;
 - (c) Confidentiality and privacy of the Fund’s investors is maintained;
 - (d) The Fund’s investors are periodically informed about the status and actions taken in respect of their complaints and grievances; and
 - (e) The complaint is examined and processed in a fair, transparent, professional and impartial manner.
- 2.2. The Investment Manager will ensure that the Fund’s investors have necessary information on how to raise their issues and complaints and escalate if they are not satisfied with the resolution or handling, including:
 - (a) Registration of complaint with the Investment Manager through email/letter;
 - (b) Registration of the complaint with SEBI through posting on the SEBI Complaints Redress System (SCORES) website;
 - (c) Resolution of disputes through the ODR mechanism; and
 - (d) Dispute resolution mechanism as per the Contribution Agreement.

3. GRIEVANCE REDRESSAL MECHANISM

3.1. *Complaint with Investment Manager*

- (a) The Fund's investors can seek a clarification to their query and are entitled to make a complaint in writing, in the manner set out below:
- (i) **Email:** An email may be sent to the Investment Manager at legal@northpointcapm.com; or
 - (ii) **Letter:** A letter may also be written and posted at 2989/E, Racher One, 3rd Floor, 12th Main Road, HAL 2nd Stage, Indiranagar, Bengaluru - 560008, Karnataka, India.
- (b) The Investment Manager shall ensure that grievances of the investors are redressed promptly but no later than 21 (twenty one) calendar days from the date of receipt of the complaint.

3.2. *SEBI SCORES Platform*

- (a) If not satisfied with the response of the Investment Manager, the investors of the Fund can also lodge their grievance directly with SEBI on the SEBI SCORES Platform at <https://scores.gov.in>, a web based centralized system available 24x7.
- (b) Investors will be required to register on the SCORES portal by providing the required details and obtain User ID and password to lodge a complaint on SCORES.
- (c) Upon receiving complaints through the SCORES platform, the Investment Manager will ensure its resolution within 21 (twenty one) days of submission of such complaint.
- (d) In the event that the complainant is satisfied with the resolution provided by the Investment Manager and chooses not to raise a review of the complaint, the complaint shall stand disposed on SCORES. However, if the investor is unsatisfied with the Investment Manager's response, he/ she shall indicate the same within 15 calendar days of receipt of reply from the Investment Manager failing which the complaint will be closed on SCORES. If he/she indicates his dissatisfaction within 15 calendar days, the complaint will be escalated to SEBI.

Note: An investor may lodge a complaint on SCORES within one year from the date of occurrence of the cause of action, where:

- (i) the investor approached the Fund/ Investment Manager for redressal of the complaint and the complaint has been rejected; or
- (ii) the investor did not receive any communication/ acknowledgment from the Investment Manager; or
- (iii) the investor is unsatisfied with the response received or redressal action taken by the Investment Manager.

3.3. *Dispute Resolution Mechanism through the ODR Portal*

- (a) After exhausting the options of lodging a complaint with the Investment Manager and approaching the SCORES Platform, if the investor is still unsatisfied with the resolution, they may initiate dispute resolution through the online dispute resolution portal ('ODR Portal') (<https://smartodr.in/login>). This will trigger time-bound online conciliation and/or online arbitration for the parties via online dispute resolution institutions. For conciliation, it shall be the endeavor of the conciliator to reach an amicable solution within 21 calendar days of the appointment of the conciliator. For arbitration, the sole arbitrator or arbitral tribunal shall pass the arbitral award within 30 calendar days of their appointment.

3.4. *Dispute Resolution Mechanism under the Fund Documents*

- (a) Any complaints/disputes not resolved to the satisfaction of an investor in the Fund per the above grievance redressal framework, will be resolved by way of the dispute resolution process agreed pursuant to the Fund Documents.