

**ABAKKUS ASSET MANAGER LLP**  
**GRIEVANCE REDRESSAL POLICY**

<b>S. No.</b>	<b>Details of Change</b>	<b>Date of creation / change</b>	<b>Author</b>	<b>Version no.</b>	<b>Approved by</b>
1	First Policy	10.11.2022	Legal Compliance Team &	V.1	Designated Partners
2	Revised as per SEBI Circular for redressal of investor grievances and Online Resolution of Disputes	15.09.2023	Legal Compliance Team &	V.2	Designated Partners

The Grievance Redressal Policy shall apply to employees involved in Products and Sales team, Service, Operations team, Investment team and Compliance team. All shall carefully read the contents of the Policy and comply with the requirements at all times.

## **A. Introduction**

Abakkus Asset Manager LLP (hereinafter referred to as '**Abakkus**') acts as an Investment Manager to SEBI registered Category I, II & III Alternative Investment Funds under SEBI (Alternative Investment Funds) Regulations, 2012. Abakkus is also registered to act as a Portfolio Manager under SEBI (Portfolio Managers) Regulations, 2020 for Discretionary, Non-Discretionary and Advisory Portfolio Management Services. Further, Abakkus undertakes Investment Advisory Services under SEBI (Investment Advisers) Regulations, 2013 through its Investment Advisory Division known as Abakkus Investment Advisors.

The Grievance Redressal policy outlines the grievance handling process through a structured grievance redressal framework. Investor inquiries and complaints are a significant voice for the Investors and a prompt and effective service is crucial for maintaining existing partnerships. Abakkus has established principles and framework to handle both queries and grievances to ensure that

- a. All Investors are treated in a fair and equitable manner.
- b. Complaints raised by Investors are dealt in a timebound manner.
- c. Investors are provided with information on how to raise their issues and complaints and escalate if they are not satisfied with the resolution or handling.
- d. A dedicated Customer Services Team is in place to handle customer queries and complaints. The process is supervised by a senior resource.

## **B. Grievance Raising Mechanism**

Investors are entitled to make a complaint in writing, orally or telephonically directly to Abakkus. Investors that are serviced by their independent advisors or distributors can also raise their complaints through their advisors and distributors.

1. It is mandatory for the Investor having grievance to take up the matter directly with Abakkus at first place.
2. For complaints related to PMS, IA and AIF, the Investors can directly reach Abakkus through email at:  
[service@abakkusinvest.com](mailto:service@abakkusinvest.com) and [complianceteam@abakkusinvest.com](mailto:complianceteam@abakkusinvest.com) (both)
3. Investors can contact Abakkus through telephone at:  
+91 22 6884 6601/02/85
4. Investors can send letters to Abakkus at:  
Abakkus Corporate Center, 6th Floor,  
Param House, Shanti Nagar,  
Near Grand Hyatt, Off Santacruz Chembur Link Road,  
Santacruz East, Mumbai – 400055
5. Abakkus shall endeavour to redress the Investor complaint(s) within within 21 (twenty-one) calendar days from the date of the receipt of the complaint by Abakkus.
6. If Investors are still not satisfied with the response from Abakkus, they can lodge their grievances with SEBI at <https://scores.gov.in/scores/Welcome.html> or may also write to any of the offices

of SEBI or contact SEBI Office on Toll Free Helpline at 1800 266 7575 / 1800 22 7575. The complaint shall be lodged on SCORES within one year from the date of cause of action, where the complainant has approached Abakkus, for redressal of the complaint and

- Abakkus has rejected the complaint or,
- The complainant has not received any communication from Abakkus or,
- The complainant is not satisfied with the reply received or the redressal action taken by Abakkus.

7. SCORES may be accessed through SCORES mobile application as well, same can be downloaded from below link:

<https://play.google.com/store/apps/details?id=com.ionicframework.sebi236330>

<https://apps.apple.com/in/app/sebiscores/id1493257302>. If the investor is not satisfied with the extent of redressal of grievance by Abakkus, there is a one-time option for 'review' of the extent of the redressal, which can be exercised within 15 days from the date of closure of the complaint on SCORES. Thereafter, the complaint shall be escalated to the supervising official of the dealing officer of SEBI.

8. After exhausting all aforementioned options for resolution, if the client is not satisfied, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at <https://smartodr.in/login>

Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with the Portfolio Manager is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.

9. The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in SCORES guidelines or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law.

10. The process on Online Dispute Resolution Mechanism is available at <https://abakkusinvest.com/regulatory-disclosure/>

### **C. Contact for assistance in filing complaints.**

- The Investors may contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on SCORES.
- The list of IAs is available on SEBI website ([www.sebi.gov.in](http://www.sebi.gov.in)).
- Investors may also seek assistance in filing complaints on SCORES from SEBI's toll free helpline number 1800 266 7575 or 1800 22 7575.

### **D. Process to register a complaint.**

- Investors who wish to lodge a complaint on SCORES (complainant) are required to register themselves on [www.scores.gov.in](http://www.scores.gov.in) by clicking on "Register here" under the "Investor Corner".
- While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email ID, Aadhaar card number(optional), Central KYC (CKYC) ID (optional) etc. are required to be provided for effective communication and speedy redressal of the grievances.
- Upon successful registration, a unique user ID and a password shall be generated and communicated through an acknowledgement email to the complainant.

- If the Investor is unsatisfied, then he may register the same on ODR portal. The Investors will have to register themselves on <https://smartodr.in/login> under “Investor Login”.
- While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email Id, Address are required to be provided.
- Upon successful registration, the investor will receive an email on the registered email address with a link to verify his/her account.

#### **E. Internal Grievance Redressal Process.**

The Customer Services Team receiving the query/complaint is responsible for the resolution of query/complaint. The Head (Customer Services Department) at the first level is responsible for ensuring that the query / complaint is resolved to the investor’s satisfaction and must attempt to offer the investor alternate solutions, however if the investor remains unsatisfied with the resolution, he can escalate the issue through the grievance redressal mechanism as mentioned above.

Queries and complaints are investigated at the various levels of escalation as maintained by Abakkus, within the time frame allotted. The investor is informed of the turnaround time for specific sorts of questions or complaints that require additional time for inquiry in case they involve fraud, legal considerations, or input from a third party. It is crucial that Abakkus promptly communicates its position on any topic, and it does so in a transparent and investor-friendly manner.

#### **F. Display of Complaints Data:**

The details of the complaints including SCORES complaints related to PMS and IA shall be disclosed on the website on monthly basis by 7<sup>th</sup> of the succeeding month in the format provided in **Annexure A** and related to AIF shall be compiled by the Abakkus Compliance department on quarterly basis by 7<sup>th</sup> in the format provided in **Annexure B** or such other format as may be prescribed by SEBI from time to time.

The details of complaints shall also be provided in the private placement memorandum of the schemes of Abakkus AIF within one month of end of each financial year.

#### **G. Management Information System (MIS) report of Investor Complaints:**

A MIS report of the complaints received, pending, and resolved will be placed before the Partners of the Abakkus, at regular intervals for their review and information.

#### **H. Maintenance of Records:**

The Register of complaint and Grievance shall be maintained and updated with details of complaints and its resolution thereof with time take for resolution.

The soft copies / hard copies of the complaints received from the Investor shall be preserved by the Customer Services team for future reference, if required.

A detailed report of complaints received and resolved and reasons for delay if any for resolution will be recorded.

The Register of complaint and grievance will be maintained for such period as prescribed by regulatory authority from time to time.

## **I. Review of Policy**

The Policy should be placed before the management and if any changes in the policy are warranted, the revised policy should be placed before the management for review and approval. Views of concerned Business Heads and chief of Internal Audit, if any, may be taken into account where the management finds it necessary. The policy will be reviewed once in a year by the Principal Officer/ Compliance Officer and one of the Partner(s).

A copy of this policy is made available at <https://abakkusinvest.com/regulatory-disclosure/>

## Annexure A

Data for the month ending - \_\_\_\_\_

Sr no.	Received from	Pending at the end of last month	Received	Resolved*	Total Pending#	Pending complaints > 3 months	Average Resolution time^ (in days)
1	Directly from Investors						
2	SEBI (SCORES)						
3	Other Sources (if any)						
	<b>Grand Total</b>						

^ Average Resolution time is the sum total of time taken to resolve each complaint in days, in the current month divided by total number of complaints resolved in the current month.

Trend of monthly disposal of complaints

Sr No	Month	Carried forward from previous month	Received	Resolved*	Pending#
1	April YYYY				
2	May YYYY				
3	June YYYY				
4	.....				
5	March YYYY				
	Grand Total				

\*Inclusive of complaints of previous months resolved in the current month.

#Inclusive of complaints pending as on the last day of the month.

Trend of annual disposal of complaints

SN	Year	Carried forward From previous year	Received	Resolved**	Pending##
1	2020-2021				
2	2021-2022				

3	2022-2023				
	Grand Total				

\*\*Inclusive of complaints of previous years resolved in the current year.

##Inclusive of complaints pending as on the last day of the year.

**Annexure B**

Investor complaints data for the quarter ending (March/June/September/December)

Sr no .	Investor Complaints received from	Pending at the end of last quarter	Received	Resolved	Total Pending at the end of the quarter	Pending complaints > 3months	Average Resolution time^ (in days)
1	Directly from Investors						
2	SEBI (SCORES)						
3	Other Sources (if any)						
	<b>Grand Total</b>						

^ Average Resolution time is the sum total of time taken to resolve each complaint in days in the current quarter divided by total number of complaints resolved in the current quarter.

2. Investor complaints data for last three Financial Years (FY)

SN	Year	Carried forward From previous year	Received	Resolved	Pending at the end of FY
1	2020-2021				
2	2021-2022				
3	2022-2023				
	Grand Total				