

MO ALTERNATIVE | COMPLAINT HANDLING AND GRIEVANCE REDRESSAL



MO Alternative IFSC Private Limited

Version 1.0

POLICY FOR COMPLAINT HANDLING AND GRIEVANCE REDRESSAL

1. INTRODUCTION

- 1.1. MO Alternative IFSC Private Limited [“Fund Management Entity” or “FME” or “we / us”] has been incorporated under the Companies Act, 2013 and registered with International Financial Services Centre Authority (“IFSCA”) as a Registered FME (Non-Retail) under the IFSCA (Fund Management) Regulations, 2022 (“FM Regulations”) with effect from February 03, 2023, bearing registration number IFSCA/FME/II/2022-23/016. FME acts as an Investment Manager to Alternative Investment Funds (AIF) registered under the trust structure in the names of Business Excellence Trust IV G, Realty Excellence Trust VI GC, IBEF IV HK Investments Fund, IBEF IV LS Investments Fund, Motilal Oswal Alternative Investment (IFSC) Trust and Motilal Oswal GIFTCity India Equity Fund of Funds Trust or any future funds for which FME will act as an Investment Manager. The AIF managed by FME shall hereinafter referred to as the “Fund”.
- 1.2. In this Policy for Complaint Handling and Grievance Redressal (“Policy”), words and expressions shall, unless expressly defined herein, have the meaning ascribed to them in the private placement memorandum for respective Funds in accordance with the FM Regulations and filed with IFSCA (“PPM”) or respective contribution agreements (“Agreement”) between the FME and respective Clients in accordance with the IFSCA (Fund Management) Regulations, 2022.

2. PURPOSE

- 2.1. Client service is a vital element for sustained business growth, and we want to ensure that our clients receive exemplary service across different touch points of their association with us. Prompt and efficient service is essential to retaining existing relationships and therefore client satisfaction becomes critical to us. Client queries and complaints constitute an important voice of clients, and this Policy details grievance handling through a structured grievance redressal framework.
- 2.2. This Policy will be followed by the FME in the event of a complaint by a client. Complainants may raise a complaint with respect to their raised capital until the same is distributed to them. Complainant may raise a complaint with respect to services related to their onboarding, obtaining consent for material changes to the fund structure, dissemination of financial information of fund, disclosures with respect to material risks associated with the fund and its portfolio investments, intimation of any non-material changes in the operations of the fund, etc. An indicative list of matters not considered as ‘complaint’ is given below:
 - 2.2.1 Anonymous complaints (except whistle-blower complaints)
 - 2.2.2 Incomplete or un-specific complaints
 - 2.2.3 Allegations without supporting documents
 - 2.2.4 Suggestions or seeking guidance/explanation
 - 2.2.5 Complaints on matters not relating to the financial products or services provided by the FME
 - 2.2.6 Complaints about any unregistered/ un-regulated activity
 - 2.2.7 References in the nature of seeking information or clarifications about financial products or services

2.3. This Policy is based on the following principles:

2.3.1 Investors are treated fairly at all times;

2.3.2 Complaints raised by investors are dealt with courtesy and in a timely manner;

2.3.3 Investors are informed of avenues to raise their complaints within the organization, and their rights if they are not satisfied with the resolution of their complaints;

2.3.4 Complaints are treated efficiently and fairly;

2.3.5 Employees of FME work in good faith and without prejudice, towards the interests of the Investors.

3. OBLIGATION OF THE FUND MANAGEMENT ENTITY

3.1. The FME will endeavour to address client grievance in a swift and effective manner and dispose of complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint. It will also aim to prevent the occurrence of similar grievances in the future.

3.2. The FME has designated Mr. Jigar Gadesha as the “Complaint Redressal Officer” or “CRO” responsible for handling of complaints received & Mr. Shubham Jain has been designated as “Complaint Redressal Appellate Officer” or “CRAO” for handling appeals of consumers against the decision taken by the Complaint Redressal Officer.

3.3. The FME will ensure that appropriate resources are dedicated for redressal of issues and queries in a timely manner.

4. COMPLAINT HANDLING PROCEDURE

4.1. Complaint may be raised on email id: giftsez.compliance@motilaloswal.com / IR.MOAlts@motilaloswal.com.

4.2. On receipt of a complaint, CRO shall make an assessment on the merits of the complaint. Pursuant to assessment,

4.1.1 In case of acceptance, the FME shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.

4.1.2 In case of non-acceptance, the FME shall inform the complainant within 5 working days along with reasons.

4.3. The FME may ask for additional information from the complainant while processing the complaint.

4.4. In case of rejection of a complaint, the FME shall give reasons for rejection of the complaint, in writing.

5. APPEAL MECHANISM

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

5.2. Complainant may file appeal on email id: shubham.jain@motilaloswal.com. The CRAO shall dispose of the Appeal within a period of 30 days.

6. COMPLAINT BEFORE THE IFSCA

6.1. Where a complainant is not satisfied with the decision of the FME and has exhausted the appellate mechanism of the FME, he may file a complaint before the IFSCA through email to grievance-redressal@ifsc.gov.in preferably within 21 days from the receipt of the decision from the FME.

7. REVIEW OF POLICY

This Policy will be reviewed in light of the changes in regulatory framework or for business or operational reasons.

8. VERSION HISTORY

Version	Effective date	Author	Approver	Approved On	Remarks
1.0	January 4, 2025	Compliance Team	Board	January 4, 2025	