





SageOne SageOne Investment Managers LLP (IFSC Branch)



SageOne

**SageOne Investment Managers LLP
(IFSC Branch)**

**Policy Name –
Complaint Handling and Grievance Redressal Policy
Version – 1.0**

DOCUMENT CONTROL

Complaint Handling and Grievance Redressal Policy, v1.0

Information Classification: Internal policy

Private & Confidential

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Document version	1.0

Particulars	Name	Date
Document creation date		December 31, 2024
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Reviewed by	Alok Nagpurkar	December 31, 2024
Approved by	Samit Vartak	December 31, 2024

DOCUMENT REVISION HISTORY

Version no.	Change Description	Date of change	Change Author	Change Reviewer	Change Approver



COMPLAINT HANDLING AND GRIEVANCE REDRESSAL POLICY

This Complaint Handling and Grievance Redressal Policy outlines the process for addressing grievances raised by investors and the steps to resolve disputes, ensuring compliance with regulations, circulars, guidelines issued from time to time by IFSCA.

For the purpose of this policy Complaint shall not include below mentioned instances:

- 1) Anonymous complaints (except whistle-blower complaints)
- 2) Incomplete or un-specific complaints
- 3) Allegations without supporting documents
- 4) Suggestions or seeking guidance/explanation
- 5) Complaints on matters not relating to the financial products or services provided by the SageOne
- 6) Complaints about any unregistered/ un-regulated activity
- 7) References in the nature of seeking information or clarifications about financial products or services

Below Steps shall be followed for COMPLAINT HANDLING AND GRIEVANCE REDRESSAL

1. The Investor shall first take up his/ her/ their grievance or complaint with SageOne (the / Fund Management Entity(FME)/ Investment Manager) by lodging a complaint directly with SageOne.
2. On receipt of a complaint, Complaint Redressal Officer (CRO) shall make an assessment on the merits of the complaint. Pursuant to assessment,
 - i. In case of acceptance, CRO shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
 - ii. In case of non-acceptance, the CRO shall inform the complainant within 5 working days along with reasons.
3. The CRO shall examine and process the complaint in a fair, transparent, professional and impartial manner.
4. The CRO has sufficient authority to resolve the complaint or has access to other officials with the necessary authority to be able to handle the complaint in a fair and impartial manner:

Provided that, where the CRO is or was involved in the conduct of the financial transaction which is the subject matter of the complaint, the complaint shall be handled by another officer designated by the Regulated Entity, in a fair and impartial manner.



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5. CRO may ask for additional information from the complainant while processing the complaint.
6. The CRO shall dispose of complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint. The CRO may either resolve the complaint or reject the complaint.
7. Alternatively, the Investor can directly initiate dispute resolution through the ODR Portal, if the grievance lodged with SageOne is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.
8. In case of rejection of a complaint, the CRO shall give reasons for rejection of the complaint, in writing.

Appeal Mechanism

1. If a complainant is not satisfied with the resolution provided by the CRO or if the complaint has been rejected by the CRO, the complainant may file an appeal before the CRAO preferably within 21 days from the receipt of the decision from the CRO.
2. The CRAO of a Regulated Entity shall be at the level of or one level below a Key Managerial Personnel
3. The CRAO shall dispose of the Appeal within a period of 30 days.

Complaint before the IFSCA (Authority)

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

Maintenance of Records

- a) SageOne shall maintain all records relating to handling of complaints, including the following:
 - i. Complaints received and processed;
 - ii. All correspondence exchanged between Sageone and the complainants;
 - iii. All information and documents examined and relied upon by the Sageone while processing of the complaints;
 - iv. Outcome of the complaints;
 - v. Reasons for rejection of complaints, if any;
 - vi. Timelines for processing of complaints; and
 - vii. Data of all complaints handled .
- b) Sageone shall maintain records in electronic retrieval form for the same period as mandated by the Authority under the relevant and applicable regulations and circulars, handbooks, guidelines thereunder:



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Provided that in case there is no specific mention of such time period, the record shall be maintained for at **least six years** from the date of disposal of complaint:

Provided further that in case of any pending litigation or legal proceeding relating to the complaint, the record shall be maintained for the applicable period, after final disposal of the proceeding

Reporting

a) SageOne shall file reports on handling of complaints in the form and manner specified by the Authority from time to time.

b) The Regulated Entity shall have a section with heading “Complaint Handling and Grievance Redressal” in its Annual Report, if Sageone is required to file an annual report for its business activities in the IFSC under the applicable laws. The section shall also provide data of all complaints received, resolved, rejected and pending during the year in a tabular/ graphical format:

Provided that where a Regulated Entity is not required to file an annual report for its business activities in the IFSC, it shall display the information on complaint handling on its website or on a dedicated webpage of its Group Entity, as applicable, under the heading “Complaint Handling and Grievance Redressal”, on an annual basis.