

MARCELLUS INVESTMENT MANAGERS PRIVATE LIMITED

GRIEVANCE REDRESSAL POLICY

| Document Control | |
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| Title | Grievance Redressal Policy |
| Policy Owner | Marcellus Compliance Team |
| Approved By | Board of Directors dated 30 th July 2021 |
| Version Number and effective date | Version no 2.0 dated 27 th May 2022 |

Version/ Annual Review Details

| S. No | Details of Changes | Date of creation / Change | Author | Version Number | Approved By |
|--------------|--|----------------------------------|-----------------|-----------------------|--------------------|
| 1 | 1st Policy | 30th July 2021 | Compliance Team | V.1 | Board of Directors |
| 2 | To widen the scope of the policy to make it applicable to the companies associates | 27 th May 2022 | Compliance team | V.2 | Board of Directors |

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I. INTRODUCTION

Marcellus Investment Managers Private Limited and its associates (“Marcellus” or “Investment Manager”) are SEBI regulated Portfolio Manager. Marcellus also manages SEBI regulated Alternative Investment Funds. Investor service is a vital element for our sustained business growth and we endeavor that our Investors receive great service from us.

Investor feedback and complaints are key to improve our services. Not each difficult interaction with investor is a complaint. Marcellus has established principles and framework handle both queries and grievances. At Marcellus, we ensure that :

- a. Investors are treated fairly
- b. Complaints raised by Investors are dealt with courtesy and in a timely 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.

II. Grievance Raising Mechanism

1. Investors are entitled to make a complaint in writing, orally or telephonically directly to Marcellus. Investors that are serviced by their independent advisors or distributors can also raise their complaints through their advisors and distributors.
2. Investors can reach Marcellus through email at:
clientsupport@marcellus.in
3. Investors can call Marcellus at:
+91 (0) 22 6267 6872
4. Investors can send letters to Marcellus at:
Marcellus Investment Managers Private Limited
929, DBS Business Centre, Kanakia Wall Street
Andheri-Kurla Road, Andheri – East, Mumbai - 400 093
5. If Investors are not satisfied with the response from Marcellus, 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. For any queries, feedback or assistance, please contact SEBI Office on Toll Free Helpline at 1800 22 7575 / 1800 266 7575

III. Internal Grievance Redressal Process

1. The Customer Relations Team receiving the query/complaint is responsible for the resolution of query/complaint. The Senior Manager- Customer Relations 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.

2. Queries/Complaints are investigated within the stipulated timelines for handling queries / complaints received at the different levels of escalation. We aim to acknowledge and respond to queries in two working days and aim to resolve any complaints within five to seven working days. Certain types of queries / complaints, involving fraud, legal inputs and third party (distributors, service providers), needing more time for investigation, are acknowledged accordingly and the turnaround time is communicated to the investor. The communication of Marcellus's stand on any issue is important and is done clearly in an investor friendly manner.
3. In case if it required by Regulations for a specific license (like the Investment Adviser's license), Marcellus will upload on its website the details of complaints on a monthly basis for investors.

IV. DISCLOSURE

1. We have made a copy of this policy available at www.marcellus.in
2. The report on voting activity undertaken shall be made available to our investors as required under the applicable regulations.