

MARCELLUS INVESTMENT MANAGERS PRIVATE LIMITED

GRIEVANCE REDRESSAL POLICY

Document Control	
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Policy Owner	Marcellus Compliance Team
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Version/ Annual Review Details

S. No	Details of Changes	Date of creation / Change	Author	Version Number	Approved By
1	1 st Policy	30 th 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
3	Annual Review: Amendment to make it applicable to Marcellus and its subsidiaries	16 th August, 2023	Compliance team	V.3	Board of Directors
4	Introduction of ODR Facility available to Clients	16 th January, 2024	Compliance team	V.4	Board of Directors
5	Annual Review ➤ Change of Registered address of the Company ➤ Process of ODR has been added	6 th September 2024	Compliance Team	V.5	Board of Directors

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I. Introduction

Marcellus Investment Managers Private Limited and its subsidiaries (“Marcellus” or “Investment Manager”) are SEBI regulated Portfolio Manager. Marcellus also manages SEBI regulated Alternative Investment Funds. Further, Marcellus is also a Fund Management Entity (Non-Retail) under IFSCA (Fund Management) Regulations, 2022 (“FME Regulations”) for providing Investment Management Services in IFSCA (hereinafter referred as “GIFT City Branch”). Investor service is a vital element for our sustained business growth and we endeavor that our Investors receive great service from us.

The Grievance Redressal policy outlines the grievance handling process through a structured grievance redressal framework. 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 Investment Manager Private Limited through email at:

For any query – clientsupport@marcellus.in

For any grievance - grievance@marcellus.in

3. Investors can reach Marcellus Capital Partners LLP through email at:

For any query – help.ia@marcellus.in

For any grievance – grievance.ia@marcellus.in

4. Investors can call Marcellus at:

For Marcellus Investment Manager Private Limited: - +91 0806-9199-400

Form Marcellus Capital Partners LLP: - +91 0806-9199-413

5. Investors can send letters to Marcellus at:

Marcellus Investment Managers Private Limited
Boston House, 102 First Floor, Suren Road,
Near WEH Metro Station, Andheri East,
Chakala MIDC, Mumbai- 400093, Maharashtra, India

If Investors are not satisfied with the response from Marcellus, they can lodge their grievances with SEBI Complaints Redress System (SCORES) at <https://scores.gov.in/scores/Welcome.html>.

Marcellus shall endeavor to redress the Investor complaint(s) within 21 (twenty-one) calendar days from the date of the receipt of the complaint by Marcellus.

If the client is not satisfied, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at <https://smartodr.in/login>

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.

The Online Dispute Resolution Mechanism Circular is available at <https://marcellus.in/wp-content/uploads/2024/01/ODR-Website.pdf>

For any queries, feedback or assistance, client can contact SEBI Office on Toll Free Helpline at 1800 22 7575 / 1800 266 7575.

III. Internal Grievance Redressal Process

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

IV. Data on website

1. The details of the complaints including SCORES complaints related to PMS and IA shall be disclosed on the website on monthly basis by 7th of the succeeding month in the format as prescribed in the respective regulations and related to AIF shall be compiled by the Compliance team on quarterly basis by 7th in the format as prescribed in the AIF Regulations.
2. The details of complaints shall also be provided in the private placement memorandum of the schemes of Marcellus AIF within one month of end of each financial year.

V. Disclosure

We have made a copy of this policy available at the website of the Company on www.marcellus.in.