

MARCELLUS INVESTMENT MANAGERS PRIVATE LIMITED (IFSC BRANCH) GRIEVANCE REDRESSAL POLICY

| Document Control | | | | |
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| Policy Owner | Marcellus Compliance Team | | | |
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I. Introduction

Marcellus Investment Managers Private Limited (IFSC Branch) is a Fund Management Entity (Non-Retail) under IFSCA (Fund Management) Regulations, 2025 ("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 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. Investor can reach Marcellus Investment Managers Private Limited IFSC Branch at:

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For any query — <u>Clientsupport@marcellus.in</u>
For grievance — <u>grievance.gift@marcellus.in</u>
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3. Investors can send letters to Marcellus GIFT City Branch at:

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Unit no. 431 and 432, Signature Building,
Fourth Floor, Block 13B, Zone-1, GIFT SEZ, GIFT City,
Gandhinagar – 382 355
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4. Marcellus shall endeavour to redress the Investor complaint(s) within 21 (twenty-one) calendar days from the date of the receipt of the complaint by Marcellus.

In case of grievance for Marcellus IFSC Brach, if a complainant is not satisfied with the decision of the Marcellus (IFSC Branch) and has exhausted the appellate mechanism of the Marcellus IFSC Branch, he/she may file a complaint before the Authority through email to grievance-redressal@ifsca.gov.in preferably within 21 days from the receipt of the decision from the Marcellus (IFSC Branch).



III. What constitutes a Complaint

A complaint is "Written expression of dissatisfaction from a client for the service rendered by the Investment Manager. An indicative list of matters not considered as 'complaint' are as follows:

- 1) Anonymous complaints (except whistleblower 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 Regulated Entity
- 6) Complaints about any unregistered/un-regulated activity
- 7) References in the nature of seeking information or clarifications about financial products or services

IV. 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 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. If query/complaint is pertaining to Marcellus IFSC branch business and which remains unresolved by client support team, the investor may reach out to Complaint Redressal Officer and Complaint Redressal Appellate Officer.

V. Data on website

- 1. A Copy of the policy will be placed on Marcellus' website.
- 2. The complaint data of Marcellus IFSC branch will be made available on website on annual basis.
- 3. Name and contact details of the Complaint Redressal Officer and Complaint Redressal Appellate Officer shall be made available on Marcellus website.

VI. Disclosure

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