

MARCELLUS INVESTMENT MANAGERS PRIVATE LIMITED (IFSC BRANCH)

GRIEVANCE REDRESSAL POLICY

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I. Introduction

Marcellus Investment Managers Private Limited (IFSC Branch) is a Fund Management Entity (Retail) under IFSCA (Fund Management) Regulations, 2025 (“FME Regulations”) for providing Investment Management Services in IFSCA (hereinafter referred as “FME/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 improving our services. Not each difficult interaction with investor is a complaint. Marcellus has established principles and framework to 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.

This Policy shall apply to all complaints pertaining to products or services offered to investors, clients, and stakeholders engaging with the GIFT City Branch in its capacity as an FME, including any existing or future financial products or services.

Note: For the purposes of this Policy, the definitions shall be governed by and construed in accordance with the applicable IFSCA grievance redressal circular(s), as issued and amended from time to time.

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/or distributors.

2. Investor can reach Marcellus Investment Managers Private Limited – IFSC Branch at:

For any query – Clientsupport@marcellus.in

For grievance – grievance.gift@marcellus.in

3. Investors can send letters to Marcellus GIFT City Branch at:
Unit no. 431 and 432, Signature Building,
Fourth Floor, Block 13B, Zone-1, GIFT SEZ, GIFT City,
Gandhinagar – 382 355

III. What constitutes a Complaint?

A complaint is “Written communication that conveys dissatisfaction or grievance in relation to the provision of financial products or services, customer interactions, operational matters, or regulatory

obligations of the FME, and for which remedial action or clarification is sought.”. 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 assessment and subsequent resolution of query/complaint. The Senior Management- 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. 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 for the appeal to Complaint Redressal Appellate Officer of Marcellus.

V. Grievance Redressal and Appeal Mechanism

1. Marcellus CRO shall endeavour to redress the Investor (non-retail consumers) complaint(s) within 21 (twenty-one) calendar days from the date of receipt of the unsolved complaint(s) received from the Client support team of Marcellus.
2. For the retail consumers (associated with Retail product(s) or service(s) of the FME, the redressal mechanism will be as follows:
 - i. On receipt of a complaint, Marcellus’s client support team shall first assess the matter and forward the complaint to CRO of Marcellus GIFT City Branch along with findings within 2 working days from the date of receipt of the complaint(s) in writing.
 - ii. Upon receipt of the request from client support team, the CRO shall assess the merits of the complaint. Pursuant to assessment,
 - a. In case of acceptance or acknowledge acceptance of complaints, in writing, - within 3 working days of receipt of the complaint.
 - b. In case of non-acceptance, FME shall inform the complainant within 5 working days along with reasons.
3. The Marcellus GIFT City Branch and/or Marcellus Client support team may seek such additional information or clarification from the complainant as may be necessary for the effective examination and processing of the complaint.

4. The Marcellus GIFT City Branch shall make best efforts to resolve the complaint within 15 days and ordinarily not exceed 30 days from the date of acceptance. Upon review, the complaint may be resolved or rejected in accordance with applicable laws and regulatory requirements.
5. Appeal Mechanism
 - i. If a complainant is not satisfied with the resolution provided or if the complaint has been rejected, the complainant may file an appeal before the CRAO of the Marcellus GIFT City Branch preferably within 21 days of receipt of the decision from the CRO of Marcellus GIFT City Branch.
 - ii. The CRAO shall dispose of the Appeal within a period of 30 days.
6. Where a complainant is not satisfied with the decision of the Marcellus GIFT City Branch and has exhausted the appellate mechanism of the Marcellus GIFT City Branch, complainant may file a complaint before the Authority (IFSCA) through email to grievance-redressal@ifsc.gov.in preferably within 21 days from the receipt of the decision from Marcellus GIFT City Branch.

VI. 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.

VII. Review: This Policy shall be reviewed annually or as and when required, in line with changes in applicable laws and regulations.

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