

Investor Grievance Redressal Policy of ValueQuest S.C.A.L.E Fund

Sl. No	Particulars	Remark
1	Date of original approval	20 th March, 2023
2	Date of last modification	20 th March, 2023
3	Approved By	VQ Compliance Team
4	Policy Owner	ValueQuest Scale Fund

1. Introduction

ValueQuest S.C.A.L.E Fund, (hereinafter referred to as ‘the Fund’) is a scheme of ValueQuest Alternate Investment Trust (hereinafter referred to as ‘the Trust’). The Trust is registered as a Category II Alternate Investment Fund (AIF) under the provision of SEBI (Alternative Investment Fund) Regulations, 2012 (“SEBI AIF Regulations”). The Fund will float Schemes from time to time [Scheme(s)].

Amicorp Trustees (India) Private Limited, acting as trustee on behalf of the Fund has appointed ValueQuest Investment Advisors Private Limited as Investment Manager of the Fund (hereinafter referred to as ‘the Investment Manager’ or ‘the Manager entity’). The Investment Manager is responsible for managing the affairs of the Fund and shall formulate policies and procedures in accordance with the Fund documents and applicable regulations for effective implementation and management of Fund and Scheme(s) investments and operations.

The AIF Regulations mandates the Investment Manager to address all investor grievances and prescribes an AIF, by itself or through the Manager or Sponsor, to lay down the procedure for resolution of disputes between the investors, AIF, Manager or Sponsor through arbitration or any such mechanism as mutually decided between the investors and the AIF.

In compliance with the above requirements, the Fund has framed the Investor Grievance Redressal Policy (the ‘Policy’) to lay down the grievance redressal framework and the dispute resolution mechanism it will follow in the event an investor raises a grievance with respect to the activities of the Funds. The Policy will be read in accordance with the provisions of the Contribution Agreements (as entered and will be entered from time to time and to the extent relevant in the current context) and the latter will prevail in case of any differences.

The Investment Manager shall designate one of its personnel as the investor relation officer who shall seek to attend to and address any investor query/concern/grievance at the earliest. The Investment Manager will ensure that this official is vested with the necessary authority and independence to handle grievances received from the investors.

2. Scope and Purpose

A grievance is defined under this policy as a written or verbal expression of dissatisfaction against the operation of the Scheme or its employees resulting from a potential damage or wrongdoing to an investor or from a violation of SEBI guidelines or related laws/regulations which may or may not request for a claim for compensation.

Grievances will include allegations such as failure to disclose conflicts of interest, misrepresentations, etc. Such grievances may be regarding processing of drawdown transactions, distribution of units etc. Investor feedbacks, queries/clarifications will not be considered as instances of complaint or grievance.

Such grievances if not addressed in due course will hamper the Fund and the Scheme’s reputation and functioning. Hence, this policy provides for the framework to be adopted by the Investment Manager with respect to effective redressal, in the event of any investor grievance.

VALUEQUEST INVESTMENT ADVISORS PVT. LTD.

Regd. & Corp. Address:

Quest, 1073, Rajabhau Desai Marg, Behind Beau Monde Towers, Prabhadevi, Mumbai – 400025, India.

☎ 022 2439 4444 ✉ backoffice@valuequest.in 🌐 www.valuequest.in CIN: U65991MH2010PTC198452 SEBI Regn. No.: INP000003724

The purpose of this policy is to develop principles for redressing investor grievances in a time bound and appropriate manner and ensuring that no compliant/grievance stays unaddressed or pending for a long period of time.

3. Key obligations of the Investment Manager and Investor Relation Officer

The Investment Manager and Investor Relation Officer will ensure adherence to the following principles:

- i. Investors are treated fairly, reasonably, justly and in a time-bound manner always.
- ii. Investor confidentiality and privacy is always maintained through a secure environment.
- iii. Investor is informed about the status or resolution through appropriate channels.

4. Grievance Redressal Framework

The Investment Manager will inform the Investors regarding the following options available for grievance redressal:

- i. **Registration of investor's grievance with the Fund/Scheme** – Any grievances received from the investors will be directed and acknowledged by the investor relation officer. The Investor Relation Officer will endeavour to resolve the complaint within a reasonable time and keep the investors duly informed of the status and actions taken.
- ii. **Registration of investor's grievance on the SEBI Complaints Redress System (SCORES) website** – Without prejudice to anything stated above, the investor may further register their grievance/complaint through SCORES (SEBI Complaints Redress System) available at <http://scores.gov.in>, post which SEBI may forward the complaint to the Investment Manager and the Investment Manager will suitably address the same. The Trust's SCORES registration number is AIF01052.

Upon receiving complaints through the SCORES platform, the Investment Manager will ensure its resolution within thirty days of submission of such complaint. During such period the investor will be kept duly informed of the status and actions taken.

- iii. **Dispute resolution mechanism** - Any dispute unresolved by the above internal grievance redressal mechanism of the Investment Manager, may be submitted to arbitration under the Arbitration and Conciliation Act, 1996. The arbitration shall be held in accordance with the terms of the Contribution Agreement.

The Dispute Resolution Mechanism between the Investment Manager and/ or the Trustee Company and the Investors of the Fund will be as specified in the relevant Fund documents and will be complied with at all times.

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5. Maintenance of Records

All documents relating to investors grievances and resolutions, including escalated matters will be maintained for records. The Investment Manager will submit periodic reports to the Trustee Company on the complaints received, status and steps taken to address the same.

6. Review of Policy

This policy will be reviewed annually or earlier, if required considering the changes in regulatory framework or for business or operational reasons, if any.

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