



**Investor Grievance Redressal Policy  
Of  
ValueQuest Investment Advisors Private Limited**

<b>Name of Company</b>	<b>ValueQuest Investment Advisors Private Limited</b>		
<b>Applicability</b>	<b>Alternative Investment Funds registered with SEBI and being managed by Company</b>		
<b>Version</b>	<b>Approval Date</b>	<b>Created by</b>	<b>Approved by</b>
<b>1/2023</b>	<b>3 March 2023</b>	<b>Compliance team</b>	<b>Board of Directors</b>
<b>2/2023</b>	<b>4 August 2023</b>	<b>Compliance team</b>	<b>Board of Directors</b>
<b>3/2024</b>	<b>10 June 2024</b>	<b>Compliance team</b>	<b>Board of Directors</b>



## 1. Introduction

ValueQuest Investment Advisors Private Limited (the “Company” or “VQ”) is Company registered under Companies Act, 1956 and acts as the Investment Manager of below mentioned Alternative Investment Funds registered under the provisions of Securities and Exchange Board of India (Alternative Investment Funds) Regulations, 2012 read with amendments and circulars (“SEBI AIF Regulations” or “Regulations”).

Amicorp Trustees (India) Private Limited, acting as trustee on behalf of the below-mentioned Trusts has appointed ValueQuest Investment Advisors Private Limited as Investment Manager of the Funds launched under Trust (hereinafter referred to as “the Investment Manager” or “Manager”).

Trust	SEBI registration no	Trustee	Funds launched
ValueQuest Alternate Investment Trust	IN/AIF2/22-23/1156	Amicorp Trustees (India) Pvt. Ltd	1. ValueQuest S.C.A.L.E Fund
ValueQuest India Investment Trust	IN/AIF3/24-25/1508	Amicorp Trustees (India) Pvt. Ltd	1. VQ FasterCAP Fund

The Investment Manager is responsible for managing the affairs of the Funds and formulation of policies and procedures in accordance with the Fund documents and applicable regulations for effective implementation and management of Fund’s investments and operations.

The AIF Regulations mandates the intermediary and Investment Manager respectively to address all investor grievances and prescribes the intermediaries, 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 Intermediary.

In compliance with the above requirements, VQ 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 related activities of the services availed from VQ. The Policy will be read in accordance with the provisions of the Agreements (as entered and to 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.

VQ 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. VQ 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 feedback, queries/clarifications will not be considered as instances of complaint or grievance.

Such grievances if not addressed in due course will hamper the Scheme/ Funds and VQ'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.

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

## 3. **Key obligations of VQ and Investor Relation Officer**

VQ 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. Investors data, confidentiality and privacy is always maintained through a secure environment.
- iii. Investor is well 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 VQ** – 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/Online Dispute Redressal (ODR) Portal** – Without prejudice to anything stated above, any 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 or directly at the SMART ODR Portal available at <https://smartodr.in/login> and the Investment Manager will suitably address the same.

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 mechanisms 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, or such amended/ additional Agreements as may be executed between VQ and the investor.

The Dispute Resolution Mechanism between VQ and the Investors of the Scheme/ Fund will be as specified in the relevant Fund documents and will be complied with at all times.

#### **5. *Timeline for resolution of Investors Grievances***

VQ shall endeavor to redress the investor complaint (s) within 21 (twenty-one) calendar days from the date of the receipt of the complaint by VQ the specified timelines mentioned in the Regulations.

VQ shall submit the Action Taken Report (“ATR”) on SCORES within 21 calendar days from the date of receipt of the complaint as directed in circular SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023.

#### **6. *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 SEBI/the Trustee (for AIFs) on the complaints received, status and steps taken to address the same.

The same shall also be updated in respective PPMs, etc. as may be required under SEBI (PM) Regulations and SEBI (AIF) Regulations, as amended from time to time.

#### **7. *Review of Policy***

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