



Complaints/ Investor Grievance Redressal

A “complaint” is any statement (whether delivered in writing, orally or electronically) of a client or any person acting on behalf of a Client alleging a grievance involving the activities of ValueQuest supervised persons in connection with the management of the Client’s account.

Employees must notify the CCO immediately upon receipt of a written or oral complaint and provide the CCO with all information and documentation in their possession relating to such a complaint. Employees are expected to cooperate fully with ValueQuest in the investigation of any Client complaint.

ValueQuest takes all Client complaints seriously and the CCO is responsible for ensuring that all complaints are handled in accordance with applicable laws, rule and regulations. Upon being notified of a potential complaint, the CCO shall promptly initiate a review of the factual circumstances surrounding any complaint (written or oral) that has been received. If it is determined that the complaint is bona fide, the CCO is also responsible for prompt and appropriate remedial action.

The CCO shall maintain a separate file for all written, oral, and electronically transmitted customer complaints, to include the following information:

- (i) identification of each complaint;
- (ii) the date each complaint was received;
- (iii) a general description of the matter complained of;
- (iv) copies of all correspondence involving the complaint; and
- (v) the written report of the action taken with respect to the complaint.

ValueQuest is responsible for managing the affairs of the investors funds and it shall formulate policies and procedures in accordance with the Disclosure/ Fund Documents and applicable regulations for effective implementation and management of ValueQuest’s Clients’/Funds’ investments and its operations.

The Applicable Indian Regulations mandates the registered intermediaries like ValueQuest respectively to address all investor grievances and prescribes the intermediaries, to lay down the procedure for resolution of disputes between the investors and Portfolio



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Manager/Investment Manager or Sponsor through arbitration or any such mechanism as mutually decided between the investors and Intermediary.

In compliance with the above requirements, ValueQuest 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 in a Fund managed by ValueQuest raises a grievance with respect to the related activities of the services availed from ValueQuest. This 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.

ValueQuest has designated a Compliance Officer as the Investor Relation Officer who shall seek to attend to and address any investor query/ concern/ grievance at the earliest. ValueQuest will ensure that this official is vested with the necessary authority and independence to handle grievances received from the investors.

A grievance is defined under this policy as a written or verbal expression of dissatisfaction against the operation of the ValueQuest's Investment Approach or Scheme or its employees resulting from a potential damage or wrongdoing to a client 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 related to transactions, reporting, distribution of units etc. Clients feedback, queries/clarifications will not be considered as instances of complaint or grievance.

Such grievances if not addressed in due course will hamper ValueQuest reputation and functioning. Hence, this policy provides for the framework to be adopted by the ValueQuest with respect to effective redressal, in the event of any client 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 compliant/grievance stays unaddressed or pending for a long period of time.

Key obligations of ValueQuest and Investor Relation Officer

ValueQuest and Investor Relation Officer will ensure adherence to the following principles:

- Investors are treated fairly, reasonably, justly and in a time-bound manner always.



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- Investors data, confidentiality and privacy is always maintained through a secure environment.
- Investor is well informed about the status or resolution through appropriate channels.

Grievance Redressal Framework

ValueQuest will inform the Investors regarding the following options available for grievance redressal:

1. Registration of investor's grievance with ValueQuest – Any grievances received from the investors will be directed to the investor relation officer. The Investor Relation Officer will endeavour to resolve the complaint within twenty days (21 days) and keep the investors duly informed of the status and actions taken.
2. Registration of investor's grievance on the SEBI Complaints Redress System (SCORES) website– 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 ValueQuest.
3. Registration of investor's grievance on the Online Dispute Redressal (ODR) Portal: After exhausting all available options for resolution of the grievance, if the investor/client is still not satisfied with the outcome, he/she/they can initiate dispute resolution through the ODR Portal available at <https://smartodr.in/login> Manager will suitably address the same.
4. Upon receiving complaints through the SCORES and/or SMART ODR platform, ValueQuest will ensure its resolution within twenty-one days of submission of such complaint. During such period, the investor /client will be kept duly informed of the status and actions taken.
5. Dispute resolution mechanism - Any dispute unresolved by the above internal grievance redressal mechanisms may be submitted to arbitration under the Indian Arbitration and Conciliation Act, 1996. The arbitration shall be held in accordance with the terms of the Client Agreement/ Contribution Agreement, or such amended/ additional Agreements as may be executed between ValueQuest and the investor/client.



6. The Dispute Resolution Mechanism between ValueQuest and the Investors/client will be as specified in the relevant agreement/ Fund documents and all applicable SEBI Circulars and Regulations will be always complied with.

Timeline for resolution of Investors Grievances

1. ValueQuest shall endeavor to redress the investor complaint (s) within 21 (twenty-one) calendar days from the date of the receipt of the complaint
2. ValueQuest 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.
3. ValueQuest shall also maintain Management Information Systems (MIS) reports and may furnish to the Board MIS reports in such form and on such periodicity as it may specify
4. Point of contact for the complaints/clarification or concerns raised (Clients & prospect Client
5. Investor/Client/ Prospect Client can let us know their concerns through any of our touch points mentioned below:
 - Telephone Number: + 91-22-69394444
 - Email - complaints@ValueQuest.in & hiten@ValueQuest.in
 - Registered/ Corporate office: Quest Investment Advisors Pvt Ltd, Quest 1073, Rajabhau Desai Marg, Behind Beau Monde Towers, Prabhadevi, Mumbai - 400025.

Categories of Clients Complaints

Given the subjective and unstructured nature of each individual complaint, this policy is not intended to bring out specific dealing procedures for individual complaint categories. Instead, this policy defines ValueQuest framework for dealing with complaints and provides high level overview of what is expected with respect to managing complaints received from clients. Each Client complaint is regarded seriously and its utmost importance to get resolved.



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Escalation Matrix

The client/investor shall first raise the concern with their respective relationship managers RMs/ Distributor/ point of contact.

If they are not satisfied with their response, the client can then write an email to compliance officer/ Investor Relation officer @ complaints@ValueQuest.in & hiten@ValueQuest.in (or) can call 022 – 69394444.

If the client is still not satisfied with the above response, then can raise their complaint to the Chief Operating Officer @chirag@ValueQuest.in or 022 – 69394444.

After exhausting above channels, client can raise the complaint with SCORES/ SMART ODR.

Responsibilities of various Officers/teams.

Any officer/ team member of VALUEQUEST receiving Client complaints, shall forward the same to compliance officer/ Investor Relation Officer.

The compliance officer/Investor Relation officer shall follow grievance redressal mechanism to address the client complaint.

Display of Complaints Data:

The details of the complaints including SCORES complaints related to ValueQuest's portfolio management service shall be disclosed on the website on monthly basis by 7th of the succeeding month and related to ValueQuest's alternative investment fund (AIF) shall be compiled by the ValueQuest Compliance department on quarterly basis by 7th in the format prescribed by SEBI from time to time.

The details of complaints shall also be provided in the private placement memorandum of the schemes of ValueQuest AIF within one month of the end of each financial year.

Any deviation to the policy:

Any deviation to the policy shall be raised to the compliance officer.

The compliance officer shall, in consultation with the CIO/principal officer, approve the deviations if thought fit.



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Maintenance of Records

All documents relating to investors grievances and resolutions, including escalated matters will be maintained for records as per the regulation.

The records relating to complaint and Grievance shall be maintained and updated with details of complaints and its resolution thereof with time take for resolution.

The soft copies / hard copies of the complaints received from the Investor shall be preserved by the Customer Services team for future reference, if required.

A detailed report of complaints received and resolved and reasons for delay if any for resolution will be recorded.