

POLICY ON DISPUTE RESOLUTION OF THE INVESTORS

1. INTRODUCTION

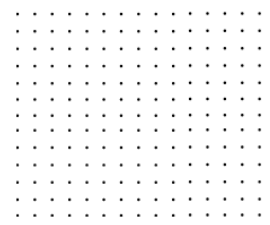
- 1.1. True Beacon Investment Advisors LLP (IFSC Branch) [“Fund Management Entity” or “FME” or “we / us”] has been constituted under the Limited Liability Partnership Act, 2008 and registered with International Financial Services Centre Authority (“IFSCA”) as a Registered FME (Non-Retail) under the IFSCA (Fund Management) Regulations, 2022 (“FM Regulations”) with effect from May 19, 2023, bearing registration number IFSCA/FME/II/2023-24/002. FME acts as an Investment Manager to Alternative Investment Fund (AIF) registered under the trust structure in the name of True Beacon Global AIF. The AIF managed and/or sponsored by FME shall hereinafter referred to as the “Fund”.
- 1.2. In this Policy on Dispute Resolution of the Investors (“Policy”), words and expressions shall, unless expressly defined herein, have the meaning ascribed to them in the private placement memorandum prepared by the FME in accordance with the FM Regulations and filed with IFSCA (“PPM”) or respective contribution agreements (“Agreement”) between the FME and respective Clients in accordance with the IFSCA (Fund Management) Regulations, 2022.

2. DEFINITIONS

- 2.1. Complaint Redressal Officer (CRO): shall be responsible for managing consumer complaints.
- 2.2. Complaint Redressal Appellate Officer (CRAO): shall be the Senior personnel handling appeals against CRO decisions.
- 2.3. Consumer: Includes retail, professional, and non-retail consumers as per IFSCA guidelines.
- 2.4. Complaint: A ‘complaint’ shall be defined as any dissatisfaction expressed by a consumer related to the RE’s financial products/services such as failure to disclose conflicts of interest, misrepresentations, etc. and complaints regarding processing of drawdown transactions, distribution of units etc, but excluding matters outlined in Annexure – A

3. PURPOSE

- 3.1. Client service is a vital element for sustained business growth, and we want to ensure that our clients receive exemplary service across different touch points of their association with us. Prompt and efficient service is essential to retaining existing relationships and therefore client satisfaction becomes critical to us. Client queries and complaints constitute an important voice of clients, and this Policy details grievance handling through a structured grievance redressal framework.
- 3.2. This Policy sets out the policy that will be followed by the FME in the event of a client grievance. However, client feedbacks, queries/clarifications, certain information requests will not be considered



3.3. This Grievance Redressal Policy is based on the following principles:

- 3.3.1. Investors are treated fairly at all times;
- 3.3.2. Complaints raised by investors are dealt with courtesy and in a timely manner;
- 3.3.3. Investors are informed of avenues to raise their complaints within the organization, and their rights if they are not satisfied with the resolution of their complaints;
- 3.3.4. Complaints are treated efficiently and fairly;
- 3.3.5. Employees of FME work in good faith and without prejudice, towards the interests of the Investors.

4. GRIEVANCE REDRESSAL FRAMEWORK

4.1.1. On receipt of a complaint, CRO of the FME shall make an assessment on the merits of the complaint. Pursuant to assessment,

- In case of acceptance, the FME shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
- In case of non-acceptance, the FME shall inform the complainant within 5 working days along with reasons.

4.1.2. The FME shall examine and process the complaint in a fair, transparent, professional and impartial manner.

4.1.3. The FME shall ensure that the CRO has sufficient authority to resolve the complaint or has access to other officials with the necessary authority to be able to handle the complaint in a fair and impartial manner:

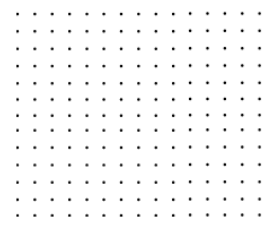
Provided that, where the CRO is or was involved in the conduct of the financial transaction which is the subject matter of the complaint, the complaint shall be handled by another officer designated by the FME, in a fair and impartial manner.

4.1.4. The FME may ask for additional information from the complainant while processing the complaint.

4.1.5. The FME shall dispose of complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint. The FME may either resolve the complaint or reject the complaint.

5. APPEAL MECHANISM

5.1.1. If a complainant is not satisfied with the resolution provided by the FME or if the complaint has been rejected by the FME, the complainant may file an appeal before the CRAO of the FME preferably within 21 days from the receipt of the decision from the CRO.



- 5.1.2. The CRAO of a FME shall be at the level of or one level below a Key Managerial Personnel: Provided that where the FME is in the form of branch, the FME may choose to designate the CRAO from its parent entity, if the same is permitted under the relevant and applicable regulations / framework under which the FME is registered or authorized or licensed by the Authority:

Explanation: The FME shall continue to be responsible for ensuring compliance with the requirements specified by the Authority.

- 5.1.3. The CRAO shall dispose of the Appeal within a period of 30 days.

- 5.2. Any complaints/ disputes not resolved to satisfaction of clients per the above grievance redressal framework will be resolved by settlement through conciliation and arbitration process as may be agreed under the respective Agreements of the clients.

6. RECORD MAINTENANCE

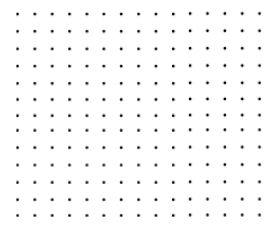
- 6.1. The FME shall maintain all records relating to handling of complaints, including the following:
- Complaints received and processed;
 - All correspondence exchanged between the FME and the complainants;
 - All information and documents examined and relied upon by the FME while processing of the complaints;
 - Outcome of the complaints;
 - Reasons for rejection of complaints, if any;
 - Timelines for processing of complaints; and
 - Data of all complaints handled by it.
- 6.2. The FME shall maintain records in electronic retrieval form for the same period as mandated by the Authority under the relevant and applicable regulations and circulars, handbooks, guidelines thereunder:

Provided that in case there is no specific mention of such time period, the record shall be maintained for at least six years from the date of disposal of complaint:

Provided further that in case of any pending litigation or legal proceeding relating to the complaint, the record shall be maintained for the applicable period, after final disposal of the proceeding.

7. REVIEW OF POLICY

This Policy will be reviewed in light of the changes in regulatory framework or for business or operational reasons.



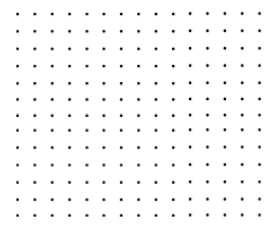
Escalation Matrix :

Level 1

Name	Kaushik Vyas
Designation	Complaint Redressal Officer
Land-Line	079-66770420
Email ID	compliance.tb@truebeacon.com
Address	334A, 3rd FLOOR HIRANANDANI SIGNATURE GIFT SEZ, GANDHINAGAR, GUJARAT

Level 2

Name	Vinod Kumar Mali
Designation	Complaint Redressal Appellate Officer
Email ID	compliance.tb@truebeacon.com
Address	334A, 3rd FLOOR HIRANANDANI SIGNATURE GIFT SEZ, GANDHINAGAR, GUJARAT



ANNEXURE A

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 FME
6. Complaints about any unregistered/ un-regulated activity
7. References in the nature of seeking information or clarifications about financial products or services.