



# GRIEVANCE REDRESSAL POLICY

Version	Date	Person Responsible
1	31-07-2025	Compliance Officer

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## 1. INTRODUCTION

*Infradawn Capital Advisors LLP*, a Limited Liability Partnership incorporated under the Limited Liability Partnership Act, 2008, having its registered office at 7th Floor, B-707, Kohinoor Square, Plot No. 46, NC Kelkar Marg, Shivaji Park, Mumbai, Maharashtra, India 400028, (herein also referred to as “LLP”), is acting as the Investment Manager to the Fund.

As on date, Infradawn Capital Advisors LLP manages schemes of Infradawn Capital AIF (Fund) registered with the Securities and Exchange Board of India (“SEBI”) as a Category II Alternative Investment Fund under the SEBI (Alternate Investment Fund) Regulations, 2012.

## 2. OBJECTIVE

This Policy aims to ensure that all grievances raised by investor’s are handled professionally, transparently, and expeditiously, enhancing investor’s trust and confidence in the Infradawn Funds and its schemes. Specifically, it seeks to:

- a. Treat all grievances fairly and equitably.
- b. Resolve grievances promptly while maintaining investor’s trust.
- c. Provide investors with clear, accessible information on the grievance redressal mechanisms available.

## 3. SCOPE

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 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 compensation claim.

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

## 4. GRIEVANCE REDRESSAL MECHANISM

### a) Complaint Handling Procedure

- An Investor may lodge a complaint directly with the Investment Manager either in writing or orally at the following:

DESIGNATION	E-MAIL ID	TELEPHONE NO.
Head - Compliance	piyush.sinha@infradawn.in	+91 8092118382
Partner and Fund Manager	vinit.sarawgi@infradawn.in	+91 9920400024

- Alternatively, an investor may submit their complaint directly to the Investment Manager for resolution via SCORES 2.0 at the following link:  
[SCORES 2.0 - Complaint Portal](#)
- The Investment Manager shall acknowledge receipt of complaint within 3 working days.
- If a complaint is not accepted, inform the complainant within 5 working days stating reasons.
- Process and resolve complaints within 30 days from the receipt of complaint.
- Provide written reasons in case of complaint rejection.

### b) Escalation to SEBI

If the investor is not satisfied with the response from the Investment Manager or if the complaint remains unresolved, they can escalate the grievance to SEBI using SCORES 2.0 at the following link:

[SCORES 2.0 - Complaint Portal](#)

Alternatively, the complaint can be lodged directly with the SEBI office.

A complaint must be lodged within 1 (one) year from the date of the cause of action, under any of the following circumstances:

- If the Investment Manager has rejected the complaint,
- If the investor has not received any communication from the Investment Manager, or
- If the investor is not satisfied with the response or redressal action taken by the Investment Manager.

## **5. REVIEW OF GRIEVANCE REDRESSAL**

If the investor is not satisfied with the extent of the redressal of their grievance by the Investment Manager, they have a one-time option for ‘review’. The review request must be made within 15 (fifteen) days from the date of closure of the complaint on SCORES 2.0.

After this period, if the investor remains dissatisfied, the complaint shall be escalated to the supervising official of the dealing officer at SEBI.

## **6. MAINTENANCE OF RECORDS**

All documents relating to investor’s complaints, correspondence and resolutions, including escalated matters will be maintained for records for a minimum period of 6 years. 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. WEBSITE DISCLOSURE**

- 1.The Grievance Redressal Policy, along with the names and contact details of the Compliance Officer shall be prominently displayed on the website.
- 2.Complaint handling data shall also be made available on the website.

## **8. REVIEW OF POLICY**

The policy should be reviewed and updated to ensure it is in line with the applicable regulatory requirement. The policy will be reviewed annually or at any time as it may deem fit to ascertain any change in the existing Grievance redressal policy and whether the controls prescribed are enough to mitigate the risk in the view of changing business environment.