



Financial Management Services IFSC LLP

Policy
on
Complaint Handling and Grievance Redressal

Approved on 10th January, 2025

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Financial Management Services IFSC LLP

Policy on Complaint Handling and Grievance Redressal

(Approved on 10th January,2025)

I. Background

NX Financial Management Services IFSC LLP is the Fund Management Entity (“Fund Management Entity” or “FME”) of NX India Opportunity GIFT Trust (“Fund” or “Trust”), a Category III Restricted Scheme launched under the Internal Financial Services Centres (Fund Management Entity) Regulations, 2022 (“**FME Regulations**”), filing of documents acknowledged by the Internal Financial Services Centres Authority (“**IFSCA**”).

International Financial Services Centres Authority (IFSCA)) vide circular F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 02, 2024 has mandated that Regulated Entities should have a policy on handling of complaints and grievance redressal, duly approved by its governing body. Keeping in view of IFSCA Circular, FME has framed this Policy on Complaint Handling and Grievance Redressal(the “Policy”).

II. Effective Date

This policy becomes effective from 10th January, 2025.

III. Objectives

This policy document aims at providing quick and effective handling of complaints/grievances received from customers/investors as well as prompt corrective & preventive actions.

This policy is to enable to put in place an effective and suitable mechanism for receiving and addressing grievances from investors with specific emphasis on resolving such complaints fairly and expeditiously.

IV. What constitutes a ‘complaint’

A complaint (grievance) is defined under this policy as a written expression of dissatisfaction of the Customer (Investor) against the operation of the Fund/FME or its employees resulting from a potential damage or wrongdoing to an investor. Investor feedbacks, queries seeking clarifications shall not be considered as complaint. This policy provides for the framework to be adopted by the FME with respect to effective redressal of the complaint.

Customer (Investor) Complaints arises generally due to

- Gaps between standards of services promised and actual services rendered.
- Inadequacy of the services made available to the customers.
- Other Issues including errors

but do not include the following;

- Anonymous complaints
- Incomplete or un-specific complaints
- Allegations without supporting documents
- Suggestions or seeking guidance/explanation
- Complaints on matters not relating to the financial products or services provided by FME
- Complaints about any unregistered/ un-regulated activity

- References in the nature of seeking information or clarifications about financial products or services
- Losses arising out of market fluctuations or any other event that is outside the control of FME

V. Obligations of Fund Management Entity

The Fund Management Entity will endeavour to address investor grievance in effective manner and it will also aim to prevent the occurrence of similar grievances in the future.

The Fund Management Entity will ensure that appropriate resources are dedicated for redressal of complaints and queries in a timely manner. Specifically, grievance redressal will be geared towards

achieving the following outcomes:

1. Investors are treated fairly, reasonably and justly at all times;
2. Investor complaints and grievances are dealt with courteously and every attempt is made to resolve complaints in a time-bound manner;
3. Investor confidentiality and privacy is always maintained and
4. Investors are periodically informed about the status and actions taken.

VI. Resolution Process:

An investor may submit a complaint or grievance by duly completing the 'Investor Grievance Redressal Form' in the form set-out in Schedule A hereto and submitting the same to Complaint Redressal Officer (CRO) at the following address:

Mr. G.G. Sambayyanamath,
 Compliance Officer
 Email: ggs@nx-block-com
 Address: Unit No.GB 14, Seat No. 1 & 2,
 Pragma Accelerator, Block 15, Zone 11,
 Road 11, Processing Area, GIFT SEZ, GIFT city,
 Gandhinagar, Gujarat State, India, PIN : 382355.

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

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

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

VII. Appeal Mechanism

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 Complaint Redressal Appellate Officer (CRAO) of the FME preferably within 21 days from the receipt of the decision from the CRO at the following address:

Mr. Biplab Bhattacharya,
Principal Officer
Email: biplab.bhattacharya@nx-block.com
Address: Unit No.GB 14, Seat No. 1 & 2,
Pragya Accelerator, Block 15, Zone 11,
Road 11, Processing Area, GIFT SEZ, GIFT city,
Gandhinagar, Gujarat State, India. PIN: 382355.

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

VIII. Complaint before International Financial Services Centres Authority(IFSCA)

Where a complainant is not satisfied with the decision of the FME and has exhausted the appellate mechanism of the FME, he may file a complaint before IFSCA through email to

grievance-redressal@ifsca.gov.in

preferably within 21 days from the receipt of the decision from CRAO.

IX. Maintenance of records

- a) FME shall maintain all the records relating to handling of complaints, including the following:
 - i. Complaints received and processed;
 - ii. All correspondence exchanged with the complainants;
 - iii. All information and documents examined and relied upon by the Regulated Entity while processing of the complaints;
 - iv. Outcome of the complaints;
 - v. Reasons for rejection of complaints, if any and
 - vi. Timelines for processing of complaints.

b) FME shall maintain records in electronic retrieval form under the relevant and applicable regulations, circulars, handbooks and guidelines.

Provided that in case there is no specific mention of time period, the records 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 proceedings.

X. Reporting

i) The FME shall file reports on handling of complaints in the form and manner specified by the International Financial Services Centres Authority from time to time.

ii) The FME shall have a section with heading “Complaint Handling and Grievance Redressal” in its Annual Report or it shall display the information on complaint handling on its website or on a dedicated webpage of its Group Entity, as applicable, under the heading “Complaint Handling and Grievance Redressal”, on an annual basis.

XI. Review of Policy

The governing body of the FME shall review this policy as required under applicable law or as it may deem necessary, in light of change in regulatory compliance and business reasons.

SCHEDULE A

NX Financial Management Services IFSC LLP

FME to

NX India Opportunity GIFT Trust

INVESTOR GRIEVANCE FORM

PERSONAL DETAILS:

*Name of the Investor: _____

*PAN of the Investor: _____

*Client ID / Folio No.: _____

Contact Details of the Investor:

*Address

*Landline/Mobile No.

Email ID.

DETAILS OF GRIEVANCE:

** Mandatory Fields*

I, the complainant, do hereby acknowledge that all the information provided in this complaint form are true to my knowledge, belief and understanding and no part of it, intentionally or otherwise, has been concealed and/or misrepresented thereof.

Date:

Place:

Signature of Investor