3PIM INTERNATIONAL (IFSC) LLP

COMPLAINT HANDLING
AND
GRIEVANCE REDRESSAL POLICY

Document Control	
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Policy Owner	Compliance Department
Preparer and Reviewer	Mohit Jain
Approved by	Designated Partners
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Version	V1
Tentative next review	On any regulatory change or as and when required

Version Summary

Version	Policy	Reviewed Date	Next Review Date	Department	Approved by
V1	Complaint Policy	First Policy	--	Compliance	Designated Partners

3PIM International (IFSC) LLP
Regd. Office: Unit 1116, 11th Floor, Signature Building,Block 13B, Zone 1, GIFT SEZ, Gift City, Gandhinagar - 382355, Gujarat, IN
Email: 3pgift@3pim.in
LLP Identification Number: ACI-1747

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1. TITLE

3PIM INTERNATIONAL (IFSC) LLP (hereinafter referred to as "**LLP**"), is the Fund Management Entity ("**FME**") registered under International Financial Services Centres Authority ("**IFSCA**") as Registered FME (Non-Retail). The LLP acts as a FME for the funds and/or schemes that it launches from time to time and as authorised by IFSCA.

2. PREAMBLE & OBJECTIVE

This Compliant Handling and Grievance Redressal Policy ("**Policy**") is made in compliance with the Circular no. F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs, dated December 02, 2024, issued by IFSCA for all the regulated entities in the IFSC. The Policy aims to protect the interests of consumers and ensure that consumer complaints are handled effectively, transparently, and within the stipulated timeframes.

This Policy applies to the LLP, its clients, and the investors in the funds / schemes launched by the LLP.

3. DEFINITIONS:

Following terms used this Policy shall have the meaning ascribed to them below:

(a) **"Complaint"** shall have the meaning ascribed to the term in Clause 4.1.

(b) **"Non-Complaint Communications"** shall have the meaning ascribed to the term in Clause 4.2.

(c) **"Query" or "Request"** shall mean a communication seeking information or clarification, which will not be classified as a complaint unless unresolved within the stipulated turnaround time.

(d) **"Consumer"** shall mean any client or customer of LLP.

(e) **"Complaint Redressal Officer"** or **"CRO"** shall mean an employee responsible for handling complaints received from consumers.

(f) **"Complaint Redressal Appellate Officer" or "CRAO"** shall mean a senior-level official responsible for appeals against decisions made by the CRO and/or Principal Officer.

4. CLASSIFICATION OF COMMUNICATION:

4.1. Complaint

A Complaint shall mean the following:

(a) communications that explicitly express dissatisfaction with LLP's financial products or services.
(b) Complaints that meet the criteria for valid submission (e.g., supported with necessary details).

4.2. Non-Complaint Communications

A Complaint shall not include the following:

(a) anonymous communications (excluding whistleblower reports);
(b) suggestions or general inquiries;
(c) allegations unsupported by documentation; and / or
(d) requests for clarification or additional information.
(e) Grievances relating solely to performance or investment underperformance.

4.3. General Principle for Classification of Consumers Communication

(a) If a query is resolved after the stipulated turnaround time and there is no reminder from the Consumer during such time period, such query will not be treated as complaint.
(b) In case of any ambiguity, the CRO shall be the sole authority to decide on the nature and classification of the communication and the decision of the CRO shall be final and binding.
(c) Multiple correspondence / communications or reminders received for the same matter within the stipulated turnaround time in this Policy for handling of the query / communication will be treated as one complaint.

4.4. Components of a Complaint

All Complaints must include the following components:

(a) Consumer's name and contact details;
(b) folio details (where applicable);
(c) detailed description of the issue; and
(d) supporting documents, if applicable.

5. COMPLAINT RECEIPT

Complaints can be submitted to LLP's Compliance Officer who is designated as Complaint Redressal Officer through the following channels:

Email: mohitj@3pim.in
Phone: +91 7597988737

6. COMPLAINT HANDLING PROCEDURE

6.1 Acknowledgment

Complaints will be acknowledged within 3 (three) working days of receipt, and the acknowledgement shall be sent by email, regardless of the mode of receipt.

6.2 Acceptance or Rejection

Accepted Complaints:

(a) CRO will notify the complainant of acceptance and initiate the resolution process.
(b) Resolutions by CRO will be provided within 15 (fifteen) working days, and no later than 30 (thirty) working days.

Rejected Complaints:

Complainants will be notified within 5 (five) working days, with reasons for rejection in writing.

6.3 Escalation Process

If the complainant is dissatisfied with the resolution of the Complaint or its rejection, he/she may appeal to CRAO and then IFSCA (as applicable) as per the following:

(a) **Escalate to CRAO**
- Submit an appeal to CRAO at venum@3pim.in within 21 (twenty one) days of the decision by the CRO.
- The CRAO will resolve the appeal within 30 (thirty) days of receipt of the appeal.
- Any complaint escalated to the CRAO shall be promptly reported to the designated partners of the LLP.

(b) **Escalate to IFSCA**
- If unsatisfied after CRAO's review, the complainant may approach the IFSCA at grievance-redressal@ifsca.gov in within 21 (twenty one) days of the CRAO's decision.

7. RECORD MAINTENANCE

7.1. The LLP will maintain following records electronically for 6 (six) years or longer (as may be prescribed by applicable law from time to time) from the date of the disposal of each Complaint:

(a) Complaints received and processed;
(b) all correspondence exchanged between the LLP and the complainants;
(c) all information and documents examined and relied upon by the LLP while processing of the complaints;
(d) outcome of the complaints;
(e) reasons for rejection of complaints, if any;
(f) timelines for processing of complaints; and
(g) data of all complaints handled.

7.2. Notwithstanding the period specified in this Clause 7, the records will be made available for audits and regulatory reviews.

8. REPORTING AND DISCLOSURE

8.1 Complaint statistics, including resolved, pending, and escalated complaints, will be included in LLP's Annual Report and prominently displayed on its website on an annual basis.

8.2 Complaint statistics, including details of resolved, pending, and escalated complaints, shall be disclosed only if required under applicable regulatory provisions:
(a) Where the LLP is required to file an Annual Report for its business activities in the IFSC, such information shall be included under the heading "Complaint Handling and Grievance Redressal" in the Annual Report.
(b) Where the LLP is not required to file an Annual Report, the information shall instead be displayed on the LLP's website (or on a dedicated webpage of its Group Entity, as applicable) under the heading "Complaint Handling and Grievance Redressal" on an annual basis.

8.3 LLP will submit periodic reports to IFSCA, as required by the applicable law.

9. CONTACT DETAILS

It details the designated points of contact at each level, starting with the initial point of contact for submitting a complaint, and progressing through higher levels for escalation of complaints. The matrix for complaint/grievance redressal flow is as provided below:

Level 1	Mr. Mohit Jain Compliance Redressal Officer (CRO) Address: Unit no. 1116, Signature Building, Eleventh Floor, Block 13B Zone – I, GIFT SEZ Gandhinagar, 382355, Gujarat, India. Email ID: mohitkj@3pim.in
Level 2	Mr. Venu Menon Principal Officer/ Complaint Redressal Appellate Officer (CRAO) Address: Unit no. 1116, Signature Building, Eleventh Floor, Block 13B Zone – I, GIFT SEZ Gandhinagar, 382355, Gujarat, India. Email ID: venum@3pim.in
Level 3	The complainant may file a complaint before the Authority through email to grievance-redressal@ifsca.gov.in preferably within 21 days from the receipt of the decision.

10. MISCELLANEOUS

10.1. The Policy will be reviewed periodically to ensure compliance with regulatory updates.
10.2. The Board of Designated Partners will approve amendments.