

COMPLAINT HANDLING AND
GRIEVANCE REDRESSAL POLICY
LICHFL ASSET MANAGEMENT COMPANY LTD -
IFSC GIFT CITY BRANCH

LICHFL Asset Management Company (LICHFL AMC) Version 1.0 |

COMPLAINT HANDLING AND GRIEVANCE REDRESSAL - LICHFL ASSET MANAGEMENT COMPANY LTD - GIFT CITY BRANCH

1. Preamble

This policy outlines the framework for handling complaints and grievances from clients, contributors/investors, and other stakeholders of LICHFL AMC at its GIFT City IFSC branch which is registered as a Fund Management Entity with International Financial Services Center Authority (**Authority**). It ensures fair, transparent, and timely resolution in line with IFSCA regulations and upholds the fiduciary responsibilities of LICHFL AMC.

2. Regulatory Requirements / References:

The International Financial Services Center Authority Regulations, 2025 including any amendments, IFSCA circular on Complaint Handling and Grievance Redressal by Regulated Entities (Entity) in the IFSC December 02, 2024, including any amendments time to time (This circular does not apply to a Foreign University, a Foreign Educational Institution, an Ancillary Service Provider, a BATF Service Provider, a Finance Company/ Finance Unit engaged in aircraft leasing or ship leasing and global/regional corporate treasury centre in the IFSC.)

3. Ownership & Policy Administration

The primary ownership of Complaint Handling Policy is with the Compliance Department. The Compliance Department shall translate Regulatory directives, guidelines into policy. The responsibility of implementing this policy is with the Compliance Officer, Gift City Branch and annual review of policy is with the Principal Officer & Compliance Officer.

An indicative list of complaints is given hereunder:

Client / beneficiary related:

- Non receipt of due interest/ redemption premium/redemption/dividend by investor
- Non creation or inordinate delay in creation of security
- Breach of covenants/ terms of issuance or underlying transaction documents
- Delay or non-cooperation in providing reports/data/information to the investors.
- Delay in finalization/ execution of documentation.

Company related:

- Unprofessional or unsolicited behavior of an employee
- Delay in processing requests for issuance of NOCs / Convening of Meetings etc.,
- Non submission / delay in providing the documents / data required by the Investors.
- Other service issues.
- Any issue other than those specified above may also be considered as complaint at the discretion of the Director & Chief Executive Officer (D & CEO).

Which are the matters that are not considered as complaints by Gift City Branch LICHFL AMC

- Complaints that are incomplete or not specific
- Allegations without supporting documents/ proof
- Seeking guidance/explanation

4. Applicability

This policy applies to all services offered by LICHFL AMC at its IFSC branch and to all personnel involved in client servicing, operations, and compliance.

5. Objective

To ensure that complaints are addressed professionally, courteously, and within prescribed timelines, thereby promoting high standards of client service and regulatory compliance.

The policy aims to provide assistance to the clients/beneficiaries who have lodged complaints and to train the LICHFL AMC staff for dealing with complaints. The policy demonstrates:

- LICHFL AMC is committed to efficient and fair resolution of complaints by its staff at all levels.
- LICHFL AMC recognizes the need to be fair to both the complainant and the employee of the Company against whom the complaint is lodged.
- LICHFL AMC attaches importance to handling complaints and has therefore delegated authority to senior functionaries in the organization for resolving complaints.

All complainants shall be treated courteously, and complaints shall be dealt with expeditiously within the prescribed timelines to the satisfaction of the clients/beneficiaries.

Complaints and resolution thereof will be recorded in the Complaints Register for or Investors Grievance Register [maintained in either a hard or soft copy] at the Gift City Branch - LICHFL AMC.

6. Receiving a Complaint

All complaints are to be directed to the Complaints Redressal Officer (CRO). The dedicated mail ID for this purpose is hamcbo@lichflamc.com, which shall also be made available on LICHFL AMC website.

7. Complaints Redressal Officer (CRO) & Complaints Redressal Appellate Officer (CRAO).

- Compliance Redressal Officer or CRO shall be an employee of the Entity responsible for handling of complaints received from the complainant. The Compliance Redressal Officer shall be the Compliance Officer.
- Complaint Redressal Appellate Officer or CRAO shall be a senior level person of the Entity Designated for handling appeals of investor against the decision taken by the Complaint Redressal Officer of the Entity. The Principal Officer shall be the Complaints Redressal Appellate Officer.

8. Responsibility of the Complaints Redressal Officer (CRO)

On receipt of a complaint on the Complaints email Id an acknowledgement of receipt of complaint is to be sent to the complainant. The CRO along with the dealing officer of the concerned Servicing / Operation / relevant team will ensure that all the complaints received are resolved within the prescribed regulatory timeline.

The CRO & dealing officer shall strive to get resolution of the complaint by constant communication within 15 working days of the receipt of Complaint not later than 30 working days of acceptance of complaint. Where the complaint like non-payment of interest / redemption premium/ redemption amount or non-creation of security cannot be resolved within reasonable time, the beneficiary/client must be advised suitably.

If a complainant is not satisfied with the resolution provided by the CRO or if the complaint has been rejected by the CRO, the complainant may file an appeal before the CRAO, preferably within 21 working days from the receipt of the decision from the CRO. The CRAO shall dispose of the Appeal within a period of 30 working days.

Where a complainant is not satisfied with the decision of the CRAO and has exhausted the appellate mechanism of the Entity, he may file a complaint before the Authority through email to grievance-redressal@ifsc.gov.in preferably within 21 working days from the receipt of the decision from the Entity.

In case of direct complaints against, Gift City Branch – LICHL AMC [except those relating to employee deficiency in services], the grievance shall be taken up by the CRO, on priority basis for resolution under guidance of the CRAO. In the case of direct complaint relating to deficiency in services, the CRAO will examine and submit the report to the D & CEO for necessary action.

9. Online system for complaint handling

An Entity may choose to develop an online system for complaint handling depending upon the nature, scale and complexity of its business along with its size and organizational structure.

10. Time Frame for resolution of complaints/grievances

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

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

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

11. Disclosure on website

The policy on Complaint Handling and Grievance Redressal shall be prominently disclosed on the website of the Entity or on a dedicated webpage of its Group Entity, as applicable, under the heading "Complaint Handling and Grievance Redressal". The name and contact details of the "Complaint Redressal Officer" and the "Complaint Redressal Appellate Officer" shall also be prominently displayed.

12. Record keeping & Complaints Register

The Complaint Redressal Officer is responsible to ensure that all complaints received are recorded. The copy of the complaints along with copies of all relevant documents shall be

maintained by the CRO. The confirmation of resolution of complaint, if any, be sent to the complainant.

The Complaint Register and Investor Grievance register will be maintained (in Excel format or on ERP) with the following particulars:

- Full Name of the Complainant along with the date of Complaint.
- Internal complaint number along with the date of receipt
- Name of Issuer/ Company Name against whom complaint is raised
- Issue Details.
- All correspondence exchanged between the entity and the complainant.
- Holding details including ISIN Numbers, if applicable.
- Nature & Brief Description of Follow-up action.
- All information and documents examined and relied upon by the Entity while processing of the complaints.
- Status of Compliant i.e., Resolved/Unresolved including actual date of redressal. Timelines for processing of complaints
- Reasons for rejection of complaints if any
- Data of all complaints handled by the Entity.

13 Employee Training & Awareness

Gift City Branch would have an ongoing employee training program on Grievance Redressal Mechanism so that all the staff are adequately trained. Appropriate channels/ modes of training would be adopted for imparting training. Training requirements would have different focuses for compliance staff and staff dealing with products, services and customers.

14. Miscellaneous

The compliance requirements under this circular are in addition to the requirements on grievance redressal contained in any other regulations specified by the Authority. Where any provision of this circular is in contradiction with any provision of the applicable Act, Rule or Regulation, the provisions of the said Act, Rule or Regulation shall prevail.

15. Review of the Policy

This policy shall be reviewed annually and placed before the Board for approval. The changes, if any, to the existing Guidelines and Regulations shall be brought to the notice of all concerned and Policy be updated suitably. The reviewed policy shall be made available for information of all employees.

Approved by Board of Directors

LICHFL Asset Management Company Limited

Date: 14-10-2025