



Kotak Alternate Asset Managers Limited
(formerly known as Kotak Investment Advisors Limited)

INVESTOR GRIEVANCE REDRESSAL POLICY - AIF

April 2022

Version control:

Version	Date	Amendment Comments	By Whom
1.0	April, 2022	Initial Document	Vijayalaxmi Khatri
1.1	March, 2024	Updation pursuant to SEBI circular no. SEBI/HO/MIRSD/MIRSD-SEC-5/P/CIR/2023/022 dated February 03, 2023	Rajeev Saptarshi

BACKGROUND:

Kotak Alternate Asset Managers Limited (“KAAML/Company”) acts as an Investment Manager to various Alternative Investment Funds (“AIFs”) registered with the Securities and Exchange Board of India (“SEBI”).

At KAAML, we believe that Investor Service is a vital element for sustained business growth and we want to ensure that our investors receive exemplary service across different funds. We also believe that prompt and efficient service is essential for retaining existing relationships and therefore, investor satisfaction is paramount for us considering we are the investment managers of various AIFs. Investor queries and complaints constitute an important voice of Investor, and this policy details grievance handling process through a structured grievance redressal framework. Grievance redressal is supported by a review mechanism, to minimise the recurrence of similar issues in future.

KAAML has an “Investor Relations” desk that is responsible for timely and prompt communication with our investors, while having an open attitude towards service recovery, and providing alternate solutions to investors, thus ensuring healthy relationships with our investors.

Communication received from the Investors will be considered as a complaint for consideration in Grievance Redressal Policy on the basis of broad parameters as determined by the IR team. Those lapses that result in further interactions and can be substantiated/proved to have occurred due to undue delay/error of KAAML and/or its service providers will, in the normal course be considered as a complaint. In case the lapse is due to misinformation or mistake on the part of the investor or any external agency not appointed by KAAML, then such a lapse will not be treated as a complaint.

These parameters are indicative as of the date of the policy and KAAML can amend these parameters over a period of time at regular intervals after taking into account the nature of interactions with the investors for considering the same as complaint. Parameters that are wide and having more than one interpretation would be interpreted as per set industry practices / proven nomenclature / precedents for the benefit of the Investors.

FRAMEWORK:

Investors can contact KAAML’s Investor Relations Team (“IR Team”) for any queries/complaints. In case they are not satisfied with the response provided by KAAML’s IR Team, they have an option to register their complaints through SEBI’s SCORES platform. However, KAAML suggests to follow the grievance redressal method stated in sub-clause A below before opting to register through the SCORES portal.

A) Through KAAML Investor Relations Team:

Investor queries arise due to lack of understanding of the product and/ or a deficiency in service experienced by Investors. Deficiency in service may include lack of proper explanation, clarifications, understanding which escalates into shortfalls in the expected delivery standards, either due to inadequacy of facilities available or through the attitude of staff towards investors. Investors can seek clarification to their query and are further entitled to make a complaint to KAAML 's Investor Relations Team through any of the modes mentioned below:

Contact number: The investors can call the Investor Helpline number or send an email to the below mentioned email ID on any business day between 9.00 am - 6.00 pm to register their queries / complaints.

Helpline number:

1. For Kotak Optimus Schemes: 022 -4336 0000 / 0701, 022-6166 0001/ 2
2. For other Kotak AIFs: 022 43360773

Email ID:

1. For CAT III AIF: lr.optimus@kotak.com
2. For CAT II AIF : PE.AIFOPS@kotak.com
3. For other Kotak AIFs: lrteam@kotak.com

Letter: Investors can address their query/complaint at the registered office mentioned below:

Kotak Alternate Asset Managers Limited
27BKC, 6th Floor, Plot No. C - 27,
G Block, Bandra Kurla Complex,
Bandra East, Mumbai – 400050

In the normal course, all queries/complaints received by KAAML's Investor Relations Team will be responded/resolved within 21 days from the date of receipt.

B) Through Registering on SEBI's SCORES Portal:

Investors can also lodge their grievance by registering themselves on SEBI SCORES platform at www.scores.gov.in. SCORES is a portal developed by SEBI for grievance redress mechanism. KAAML will redress the grievance within 21 days of receipt of the grievance through SCORES or any other timeline as stipulated by SEBI.

C) Online Resolution of Disputes through SMART ODR Portal.

An investor shall first take up his/her/their grievance with KAAML by lodging a complaint directly with KAAML as mentioned in point A above. If the grievance is not redressed

satisfactorily, the investor may, in accordance with point B above, escalate the same through the SCORES Portal.

After exhausting these options for resolution of the grievance, if the investor is still not satisfied with the outcome, he/she/they can initiate dispute resolution through the Online Dispute Resolution Mechanism (“ODR”) offered by SEBI through the Smart ODR Portal on website <https://smartodr.in/login>

Alternatively, the investor can initiate dispute resolution through the ODR Portal if the grievance lodged is not satisfactorily resolved or at any stage of the subsequent escalations as mentioned in point A and B above (prior to or at the end of such escalation/s).

KAAML may also initiate dispute resolution through the ODR Portal after having given due notice of at least 15 calendar days to the investor for resolution of the dispute which has not been satisfactorily resolved between the investor and KAAML.

The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in terms of the points A and B above or SCOREs guidelines as applicable or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law (including when moratorium under the Insolvency and Bankruptcy Code is in operation due to the insolvency process or if liquidation or winding up process has been commenced against KAAML.

The dispute resolution through the ODR Portal can be initiated when within the applicable law of limitation.

(reckoned from the date when the issue arose/occurred that has resulted in the complaint/date of the last transaction or the date of disputed transaction, whichever is later).

All matters that are appealable before the Securities Appellate Tribunal in terms of Section 15T of SEBI Act, 1992 (other than matters escalated through SCOREs portal in accordance with SEBI SCOREs Circular), Sections 22A and 23L of Securities Contracts (Regulation) Act, 1956 and 23A of Depositories Act, 1996 shall be outside the purview of the ODR Portal.

INTERNAL MACHINERY TO HANDLE INVESTOR COMPLAINTS

Queries/Complaints are investigated within the stipulated timelines at the different levels of escalation. Certain types of queries/ complaints, involving fraud, legal inputs and third party, needing more time for investigation, are acknowledged accordingly and the turnaround time is communicated to the investor. The prompt communication of KAAML’s stand on any issue is important and is done clearly in an investor friendly manner.

POLICY REVIEW

This Policy shall be amended as and when necessary with the approval of the Committee of Directors ("**COD**") of KAAML.

