

**GUARDIAN CAPITAL PARTNERS FUND**  
**SEBI REGISTRATION NO: IN/AIF3/21-22/0918**

**GUARDIAN PARTNERS LLP**  
**(INVESTMENT MANAGER)**

**INVESTOR GRIEVANCE REDRESSAL POLICY**

This Policy is formulated to provide efficient services to the investors and to effectively address and redress the grievances of the investors in a timely manner.

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## **I. Introduction**

Guardian Capital Partners Fund (“**Trust**”) is a contributory, irrevocable, non-discretionary and a determinate trust which is registered in India. Guardian Capital Partners Fund – Opportunities Scheme is a scheme of the Trust (“**Scheme**”). The Trust, the Fund and its schemes as it may launch from time to time, shall be managed by the Investment Manager pursuant to the Investment Management Agreement. The Trust has been registered as a Category III AIF with SEBI vide registration number IN/AIF3/21-22/0918 dated Aug 06, 2021

Guardian Partners LLP a limited liability partnership incorporated under the Limited Liability Partnership Act, 2008, having its registered address at 9, Sita Niwas, Plot No. 150, 14th Road, Near Ambedkar Garden, Chembur (East), Mumbai, Bandra Suburban 400071, appointed by the Trustee as Investment Manager in respect of the Trust and the Fund under the Investment Management Agreement.

As per the PPM, the investment objective of the Scheme is to generate long term absolute returns on the Unitholder’s capital. The investment strategy of the Scheme is to primarily invest in listed Indian equities. The Scheme will be market cap agnostic and investing across the spectrum of large cap, mid cap and small cap stocks.

## **II. Effective Date**

This policy will be effective from April 01, 2023.

## **III. Purpose**

Providing excellent service on a regular and consistent basis is very important for the Trust’s sustained growth. Investment Manager believes that quick and effective handling of grievances as well as prompt corrective & preventive actions and processes are essential for providing our services. This policy document 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. Investor queries and complaints constitute an important voice of Investor, and this policy details complaint/grievance handling through a structured grievance redressal framework. Grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in future.

This policy sets out the grievance redressal policy (**Policy**) that will be followed by the Investment Manager in the event of an investor(s) grievance(s)/complaint(s). Grievances include allegations such as failure to disclose conflicts of interest, misrepresentations, etc. and complaints regarding reports / statements to investors, complaints regarding terms/aspects of PPM, Contribution Agreement, complaints regarding processing of drawdown transactions, issue (re-issue), transfer, redemption, distribution of units etc. Investor feedbacks, queries/clarifications will not be considered as instances of complaint or grievance.

Investor queries and complaints constitute an important voice of investors, and this Policy details grievance handling through a structured grievance redressal framework. Grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in future.

## **IV. Obligations of the Investment Manager**

1. The Investment Manager will endeavor to address investor grievance in a swift and effective manner within a time period of [30] days from the date on which the grievance is raised. It will also aim to prevent the occurrence of similar grievances in the future.
2. The Investment Manager will ensure that appropriate resources are dedicated for redressal of issues and queries in a timely manner. Specifically, grievance redressal will be geared towards achieving the following outcomes:
  - (a) Investors are treated fairly, reasonably, and justly at all times;
  - (b) Investor complaints and grievances are dealt with courteously and every attempt is made to resolve issues in a time-bound manner;
  - (c) Investor confidentiality and privacy is always maintained;
  - (d) Investor is periodically informed about the status and actions taken
3. The Investment Manager will inform the Investors regarding the following options available for grievance redressal:
  - (a) Registration of complaint:
    - a. with the Investment Manager through email/letter; or
    - b. with SEBI through posting on the SEBI Complaints Redress System (SCORES) website
  - (b) Dispute resolution mechanism

## **V. Grievance Redressal framework**

### **Procedure 1**

Investor queries / complaints arise due to lack of understanding or a deficiency of service experienced by investors. Deficiency of service may include lack of 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 in writing, orally or telephonically. Investors are requested to approach the Investment Manager directly, and in the normal course can expect a response within [5] business days of query / complaint registration.

Investor Grievance Email: Investors can send an email to [ss@guardiancappartners.com](mailto:ss@guardiancappartners.com) or

Letter: Investors can write to the Investment Manager with their query/complaint at the registered office address as mentioned here: 9, Sita Niwas, Plot No.150, 14th Road, Near Ambedkar Garden, Chembur East, Mumbai 400071, Maharashtra, India.

### **Procedure 2**

Registration of complaint on the SCORES website ([www.scores.gov.in](http://www.scores.gov.in))

- (a) The investors will have an alternate option to register their complaints directly to SEBI on the SCORES website.
- (b) Upon receiving complaints through the SCORES platform, the Designated Partner and his delegated official of the Investment Manager will ensure its resolution within thirty days of submission of such complaint. During such period, the investor will be kept duly informed of the status and actions taken.

Any service requests, queries, grievances and complaints received:

- at a number other than the designated telephone number or
- at an email id other than the designated email ids
- by way of a letter at an address other than the designated address

- should be immediately brought to the attention of the Investment Manager.
- Any grievance or complaint, received from SEBI (through the SCORES Portal) shall be promptly forwarded by the Investment Manager.

All service requests, queries, grievances and complaints received will be recorded in investor grievance register.

### Procedure 3

All concerns raised by investors will be tagged and bucketed into:

- (a) Service Request
- (b) Query
- (c) Grievance
- (d) Complaints

Data of all such service requests, queries, grievances and complaints will be maintained by the Investment Manager.

Below is a list of examples; however, the same are not exhaustive:

- (a) Service Request
  - i. Request for account statement
  - ii. Request for monthly/ quarterly portfolio
  - iii. Request for Change of Address
  - iv. Change of Bank Mandate
  - v. Change in Mode of Holding
  - vi. Change of Status
  - vii. Transmission
  - viii. Registration/ Cancellation of Nominee
  - ix. Pledge / Un-pledge the Units
  - x. Registration/Revocation of Power of Attorney (POA)
  - xi. Duplicate statement
  - xii. Request for re-dispatch of Returned Un-delivered documents / statements
  - xiii. Request for Private Placement Memorandum
  - xiv. Request for Tax Deduction at Source (TDS) Certificate
  - xv. Others – Miscellaneous Service Request
- (b) Query
  - i. Discrepancy in personal data
  - ii. Discrepancy in investment data
  - iii. Non receipt of redemption proceeds
  - iv. Non receipt of Units or Units Certificate
  - v. Taxation related query
  - vi. Wrong allotment of units/ Wrong application
  - vii. Excess or wrong charge of load

- viii. Wrong calculation of TDS
- ix. Non-receipt of annual report

(c) Grievance

- i. Performance of Scheme / Portfolio
- ii. Lapse in service due to Investment Manager not providing complete information
- iii. Lapse in service due to external factor
- iv. Repeated reminders on queries being unanswered

(d) Complaints

- i. Delay – exceeding turnaround time (TAT) defined by Investment Manager/SEBI, whichever is lower
- ii. Accuracy – wrong / error in processing / incorrect information / misguidance / mis-selling
- iii. Completeness – incomplete / inadequate service
- iv. Deviation in any aspect defined in the PPM/ SEBI – service / investment related
- v. Behavior of service personnel – impolite / misbehavior
- vi. Any other action that is not acceptable / in line with general service standard

The lapses on any of the above ground need to be proved.

If such lapse is due to the Investment Manager / Investment Manager's service provider, the same shall be treated as a complaint. If such lapse is not due to the Investment Manager/ Investment Manager's service provider but due to investor / any external agency, the same shall be treated as grievance.

Procedure 4

Escalation Matrix

Procedure 5

**Grievances or Complaint received through SCORE**

Investment Manager will redress the grievance within 30 days from the date of receipt from SCORE failing which the complaint shall be registered in SCORES. The Investment Manager shall update the action taken report (ATR) along with supporting documents, if any, electronically in SCORES. The proof of dispatch of the reply of the Investment Manager to the concerned investor should also be uploaded in SCORES and preserved by the Investment Manager for future reference.

A complaint shall be treated as resolved/dispensed/closed only when SEBI disposes/closes the complaint in SCORES. Failure by Investment Manager to file ATR under SCORES within thirty days of date of receipt of the complaint shall not only be treated as failure to furnish information to SEBI but shall also be deemed to constitute non-redressal of investor complaint.

Procedure 6

### **Complaint Review Process**

- Quarterly review of complaints will be undertaken in liaison with the Investment Manager

#### Procedure 7

### **Disclosure**

On periodic basis the status of investor complaints shall be updated to the SEBI in Monthly / Quarterly Reports filed with SEBI, if applicable.

### **Dispute Resolution Mechanism**

Any complaints/disputes not resolved to satisfaction of investors, the above grievance redressal framework will be resolved as per the dispute resolution as agreed under the respective investor contribution agreement.

Investors may also decide to raise complaints with the Trustee to the Trust/Fund.

### **Turn Around Time**

- (a) The turn around time (TAT) is the maximum time permitted in terms of working days, to reply to a complaint, appropriately.
- (b) For letters received through regulatory authorities, TAT is the date for reply as indicated by the said regulator in their letter, unless an extension is sought.
- (c) For complaints received from all other sources, TAT is T+10 (T = date of receipt of Complaint; +10 = additional ten working days).

### **Grievance / Complaint Register**

The Investment Manager shall maintain Grievance / Complaint Register and shall enter therein the details of the complaints received.

## **VI. Review of Policy**

The governing body of the Investment Manager 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.

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