**GUARDIAN PARTNERS LLP**

**GRIEVANCE REDRESSAL POLICY**

**April 2026**

**VERSION 2**

| Sr. No. | Name of the Fund |
|---|---|
| 1. | Guardian Capital Partners Offshore Fund, registered with the IFSCA as a Category III Alternative Investment Fund - Restricted Scheme (Non-Retail Scheme) |

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## Part I: Background

Guardian Partners LLP is registered with International Financial Services Centres Authority ("**IFSCA**") as a Fund Management Entity (Non-Retail) under the IFSCA (Fund Management) Regulations, 2025 ("**IFSCA FM Regulations"**) and acting as the fund manager entity of the following fund ("**Investment Manager**"):

| Sr. No. | Name of the Fund |
|---|---|
| 1. | Guardian Capital Partners Offshore Fund, registered with the IFSCA as a Category III Alternative Investment Fund - Restricted Scheme (Non-Retail Scheme) |

## Part II: Preamble and Objective

The objective of the Investor Grievance Redressal Policy (the "**Policy**") is to provide efficient services to the investors and to effectively address and redress the grievances of the investors in a timely manner. It also helps build investor confidence by formulating investor grievance redressal mechanism and to develop friendly relations with the investors.

The Investor Grievance Redressal Policy shall be displayed on the website of the Investment Manager.

The Investment Manager should:

- Ensure visibility and accessibility of complaint handling process to all complainants
- Handle complaints professionally & in a transparent manner
- Ensure confidentiality of complainants information unless required for addressing the complaint
- Ensure clear accountability for resolution and reporting of complaints
- Ensure complaints are dealt with in a timebound manner.
- Ensure investor awareness on how to investors can raise their issues and complaints and escalate if they are not satisfied with the resolution or handling
- Continually improve its processes & systems by taking inputs/ feedback from the investors

The Investment Manager shall address all the queries/ grievances/ concerns brought to its attention by the investors and also classify & differentiate queries, requests, and complaints, etc. and accordingly resolve them to the satisfaction of the concerned investors.

The Compliance Officer is responsible for ensuring provision of prompt and effective services to the investors and monitoring the dedicated email address of the Fund for investor grievances.

## Part III: General Principle

- Investors are treated fairly at all times.
- Grievances / complaints raised by Investors are dealt with courtesy and in a timely manner.
- Queries and grievances / complaints are treated efficiently and fairly.
- The investment manager of the Fund works in good faith and towards the interests of the Investors.

## Part IV: Escalation Process

For the purposes of this Policy, a (**"Complaint"**) shall mean any written or electronic communication, including any representation or statement, made by an Investor, which expressly conveys dissatisfaction, grievance, or concern in

relation to any act, omission, service, disclosure, or conduct of the Fund, the Investment Manager, the Trustee, or any of their respective officers, employees, agents, or delegates, arising out of or in connection with:

a. Non-receipt or delay in processing of subscription, redemption, or distribution proceeds.
b. Discrepancies in Net Asset Value (NAV) calculation or reporting.
c. Issues related to disclosures, portfolio information, or regulatory compliance.
d. Alleged breach of contractual terms under the Contribution Agreement or Fund Documents.
e. Conduct of the Investment Manager, Trustee, or any appointed service provider impacting investor rights or interests.
f. Any other matter that, in the opinion of the Investor, adversely affects their investment or relationship with the Fund.

A Complaint does not include:

a. General inquiries or requests for information.
b. Matters already resolved or pending before any authority.
c. All other matters as mentioned in Schedule I of circular bearing F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs,[1] dated December 02, 2024, and as may be provided by the IFSCA from time to time.

i. **In case of any query/complaint, the Investors can write to Compliance / Grievance Redressal Officer:**

Shrenik Shah
Unit No. GB-45, Ground Floor, Pragya Accelerator, Block 15, Zone 1, Road No. 11, Processing Area GIFT SEZ, GIFT City, Gandhinagar – 382355, Gujarat, India
Email address: operations@guardiancappartners.com
Tel.: +91 7021519394

The Compliance Officer shall act as the Complaint Redressal Officer (CRO), responsible for receiving, acknowledging, and resolving investor complaints.

ii. **If not satisfied with the response of the Compliance Officer / Grievance Redressal Officer, then Investors can write to the Trustee**

Catalyst Trusteeship Limited
627, Hiranandani Signature, 6th Floor, Block 13B, Zone 1, SEZ, GIFT City, Gandhinagar – 382355
Email address: aifgiftcity@ctltrustee.com
Tel.: +91 9106441879

The Trustee shall act as the Complaint Redressal Appellate Officer (CRAO), responsible for reviewing unresolved complaints escalated by investors.

iii. **If not satisfied with the response from the above mentioned persons, the Investors can**

Lodge grievances / complaints with any of the IFSCA offices through email to grievance-redressal@ifsca.gov.in preferably within 21 days from the receipt of the decision from the Investment Manager, where;

[1] https://ifsca.gov.in/Document/Legal/complaint-handling-and-grievance-redressal-by-regulated-entities-in-the-ifsc

a. complainant has approached Investment Manager/ Trustee, for redressal of the complaint and they have rejected the complaint or,
b. The complainant has not received any communication from them or,
c. The complainant is not satisfied with the reply received or the redressal action taken by them.

iv. Any complaints/disputes not resolved to the satisfaction of investors as per the above grievance redressal framework will be resolved by settlement through conciliation and arbitration process, under the Arbitration and Conciliation Act, 1996, as may be agreed under the respective Contribution Agreements/ Client Agreements of investors.

## Part V: Resolution of Complaints

All complaints shall be acknowledged within 3 working days. If not accepted, the complainant shall be informed with reasons within 5 working days. General Turn Around Time (TAT) for response to complaint (from the receipt of the valid complaint in writing) shall be 30 days.

In the interest of efficiency, multiple communications received for the same complaint within the stipulated TAT in this Policy, shall be treated as a single complaint.

Note: The above TAT can change depending upon the nature and complexity of the complaint, in case of TAT exceeding the prescribed timeline it shall promptly be communicated to the Investors. If the Investor does not receive a reply within the prescribed TAT, they may escalate the complaints through the procedure mentioned under Part IV: Escalation Process. Additionally, the Investors are urged to avoid lodging or sending numerous complaints under the TAT.

## Part VI: Maintenance of Records

The Register of complaint and Grievance shall be maintained and updated with details of complaints and its resolution thereof with time take for resolution.

The soft copies / hard copies of the complaints received from the Investor shall be preserved for future reference, if required.

A detailed report of complaints received and resolved and reasons for delay if any for resolution will be recorded.

The Register of complaint and grievance will be maintained for such period as prescribed by regulatory authority from time to time.

The Investment Manager shall file reports on handling of complaints in the form and manner specified by the IFSCA from time to time.

## Part VII: Review of Policy

**Amendments/Updates, Review, and control**

The Compliance Officer will review this Policy on an annual basis or earlier, if required, in light of change in regulatory compliance and business reasons.

If there are any regulatory changes, the effective date of the amendment will be from the date when the notification of the amendment is received.