Carpediem Advisors Private Limited (IFSC Branch)

Vincit Capital

Yugadi Capital

Complaints Handling and Grievance Redressal Policy

Version	Effective Date	Summary	Approver
V 1. 0	1st April, 2025	Complaint Handling and Grievance Redressal by Regulated Entities in the IFSC" dated December 02, 2024.	Board of Directors
V 1. 1	1st July, 2026	Updation of name of CRO	Board of Directors

Carpediem Advisors Private Limited (IFSC Branch):

Unit No. GB - 16, Seat No. 1-4, GF Floor, Pragya Accelerator,

Block 15, Road 11, Zone- 1, Processing Area in GIFT

Multi-Services-Special Economic Zone, Gandhinagar - 382355

Complaint Redressal Officer (CRO)

Name: Ms. Richa Patel (Compliance Officer)

Compliant Redressal Appellate Officer (CRAO)

Mr. Hithendra Ramachandran (Principal Officer)

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Complaints Handling and Grievance Redressal Policy

1. Overview

Carpediem Advisors Private Limited ("Company"), through its branch office Carpediem Advisors Private Limited (IFSC Branch) ("CAPL IFSC"), is registered with the International Financial Services Centres Authority ("IFSCA") as a Fund Management Entity (Non-Retail) under the IFSCA Fund Management Regulations, 2022 ("FM Regulations") vide approval letter dated January 24, 2023. The registration number of CAPL IFSC is IFSCA/FME/II/2022-23/056.

Vincit Capital ("Vincit"), a fund launched by CAPL IFSC under the FM Regulations, has been granted registration as an 'Alternative Investment Fund – Category II' by the IFSCA under the FM Regulations vide approval letter dated 27 February 2023. The registration number of Vincit is IFSC/AIF2/2022-23/0042.

Yugadi Capital ("Yugadi"), a fund launched by CAPL IFSC under the FM Regulations, has been granted registration as an 'Alternative Investment Fund – Category II' by the IFSCA under the FM Regulations vide approval letter dated 25 October 2023. The registration number of Vincit is IFSC/AIF2/2023-24/0074.

In accordance with the IFSCA Circular on Complaint Handling and Grievance Redressal dated December 02, 2024, this policy establishes a structured framework for efficiently addressing investor complaints. It sets out detailed procedures, resolution timelines, escalation mechanisms, record maintenance protocols, disclosure requirements, and regulatory reporting obligations.

This policy has been approved by the Board of Directors to ensure a transparent, fair, and effective grievance redressal mechanism, in compliance with IFSCA regulations, for resolving investor concerns related to financial services provided by the Company.

2. What is a complaint?

A complaint (grievance) is defined under this policy as a written expression of dissatisfaction of the investor against the operation of the Fund/FME or its employees resulting from a potential damage or wrongdoing to an investor. Investor feedbacks, queries seeking clarifications shall not be considered as complaint. This policy provides for the framework to be adopted by CAPL IFSC with respect to effective redressal of the complaint. Investor Complaints could potentially arise in normal course of business due to:

- Gaps between standards of services promised and actual services rendered.
- Inadequacy of the services made available to the customers.
- Other Issues including errors

Indicative list of what is not treated as a complaint:

- Anonymous complaints (except whistleblower complaints),
- Incomplete or unspecific complaints,
- Allegations without supporting documents
- Suggestions or seeking guidance/explanation

- Complaints on matters not relating to the financial products or services provided by CAPL IFSC
- Complaints about any unregistered/ unregulated activity
- References in the nature of seeking information or clarifications about financial products or service
- Any other matters as may be decided by the Board of Directors of CAPL IFSC depending on the facts and circumstances of the case from time to time.

3. <u>Complaint Handling Procedure:</u>

a) Any Investor who wishes to file any complaint or grievance can send an email to ir@carpediem-capital.com or letter to the address of CAPL IFSC. The same is reproduced as under for ease of reference:

Carpediem Advisors Private Limited (IFSC Branch),
Unit No. GB - 16, Seat No. 1-4, GF Floor, Pragya Accelerator,
Block 15, Road 11, Zone- 1, Processing Area in GIFT
Multi-Services-Special Economic Zone, Gandhinagar - 382355

b) The email/letter should clearly mention the full facts of the complaint or grievance for CAPL IFSC to check, investigate and respond to the complainant.

c) On receipt of a complaint, CRO shall assess the merits of the complaint. Pursuant to assessment,

i. In case of acceptance, CAPL IFSC shall acknowledge acceptance of complaints, in writing, within 5 working days of receipt of the complaint.
ii. In case of non-acceptance, CAPL IFSC shall inform the complainant within 7 working days along with reasons.

iii. CAPL IFSC shall examine and process the complaint in a fair, transparent, professional and impartial manner.

iv. Where the CRO is or was involved in the conduct of the financial transaction, which is the subject matter of the complaint, the complaint shall be handled by another officer designated by the CRAO, in a fair and impartial manner.

v. CAPL IFSC may seek such additional information from the complainant, as maybe necessary to review and processing the complaint.

vi. Upon receipt of such additional information in a timely manner, CAPL IFSC shall dispose of the complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint.

vii. Resolution of the complaint or rejection with reason for rejection would be communicated to the complainant in writing by email / letter.

4. **Appeal Mechanism (with CAPL IFSC):**

a) If a complainant is not satisfied with the resolution provided or if the complaint has been rejected, the complainant may file an appeal before the CRAO of the CAPL IFSC preferably within 21 days of the receipt of the decision from the CRO.
The email id of CRAO is hithendra@carpediem-capital.com

b) The CRAO shall dispose of the Appeal within a period of 30 days

5. **Compliant before the Authority (IFSCA):**

Where a complainant is not satisfied with the decision provided by CRO and CRAO of CAPL IFSC, they may file a complaint with IFSCA through email to grievance-redressal@ifsca.gov.in preferably within 21 days from the receipt of the decision from CAPL IFSC.

6. **Maintenance of Records:**

CAPL IFSC shall maintain all records relating to the handling of complaints, including the following:

i. Complaints received and processed,
ii. All correspondences exchanged between DSP IFSC and the complainants,
iii. iii. All information and documents examined and relied upon by CAPL IFSC while processing the complaints,
iv. Outcome of the complaints,
v. Reasons for rejection of complaints, if any,
vi. Timelines for processing of complaints, and
vii. Data of all complaints handled by CAPL IFSC.

CAPL IFSC shall maintain records in electronic retrieval form for the same period as mandated by the Authority under the relevant and applicable regulations and circulars, handbooks, guidelines thereunder.

Provided that in case there is no specific mention of such time period, the record shall be maintained for at least six years from the date of disposal of complaint:

Provided further that in case of any pending litigation or legal proceeding relating to the complaint, the record shall be maintained for the applicable period, after final disposal of the proceeding.

7. **Role of Compliance and Risk Manager**:

The Compliance Officer of CAPL IFSC shall ensure that handling and disposal of complaints by the CAPL IFSC are in accordance with the regulatory requirements specified by IFSCA.

8. **Review**

The policy shall be reviewed by Board of Directors on periodic basis and necessary changes, regulatory or otherwise, shall be carried out and updated in the said policy and shall be recommended to Board to Directors for their approval.