



CHIRATAE VENTURES OFFSHORE MANAGER LLP

COMPLAINTS HANDLING AND GRIVANCE REDRESSAL POLICY

Compliance Officer – Vaibhav Modi

Principal Officer – Swaminathan Shankar



Introduction

Chiratae Ventures is one of India's leading venture capital firms primarily focused on investing in startups with technology at the core with special focus on Consumer Tech, Enterprise Tech/SaaS, FinTech, Health-Tech, Deep-Tech, Ed-Tech, Agri-Tech, etc.

Chiratae Ventures Offshore Manager LLP, a limited liability partnership established under the laws of India, has sought registration as a registered FME (Non-Retail) with International Financial Services Centres Authority ("IFSCA") under the IFSCA (Fund Management) Regulations 2022 ("IFSCA (FM) Regulations").

Chiratae Ventures International Fund V (the "Fund"), established as a trust constituted under the Indian Trusts Act, 1882.

The Fund is a Restricted Scheme (non-retail) construed as Category II AIF under IFSCA (FM) Regulations with a tenure of 10 years from the initial closing which is further extendable by 2 years.

Axis Trustee Services Limited (the "Trustee") has appointed Chiratae Ventures Offshore Manager LLP as the investment manager ("Investment Manager/Firm") of the Fund pursuant to the terms of the investment management agreement.

Investment Advice and Pattern

The Investment Manager has entered into an investment advisory agreement ("Investment Advisory Agreement") with Chiratae Ventures India Advisors Private Limited (the "Investment Advisor") to receive non-binding and non-exclusive investment advice.

The Fund seeks to make investments primarily in technology and technology enabled companies in India ("India Investments") and in other jurisdictions ("Offshore Investments").

The Fund will make: (i) India Investments indirectly through Chiratae Ventures Master Fund V, a scheme of Chiratae Trust V II (the "Indian Master Fund"), an Indian fund managed by Chiratae Ventures India V Manager LLP an affiliate of the Investment Manager, and (ii) Offshore Investments directly.

Regulations

It is required to have an efficient and effective mechanism for handling of complaints and redressal of grievances of the customer as per IFSCA Circular dated December 02, 2024, on Complaint Handling and Grievance Redressal by Regulated Entities in IFSC.

Aim of the Policy

The Investment Manager will endeavour to address all complaints regarding service deficiencies or cause for grievance, for whatever reason, in a reasonable manner and time.

The Investment Manager is committed to ensure robust, transparent, an efficient, fair and structured mechanism for handling complaints and keep the stake holders informed as to progress of their complaint and expected timeframe for resolution.

This Policy aims to:

- Establish a structured and effective grievance redressal mechanism.
- Provide a fair, transparent, and time-bound resolution of complaints.
- Ensure compliance with regulatory obligations prescribed by IFSCA.
- Enhance investor confidence by promoting accountability and responsiveness.
- Maintain appropriate records of all complaints and their resolutions.

This policy applies to all complaints received from investors, distributors, regulators, and any other stakeholders dealing with the Investment Manager.

Complaints Handling Procedure

- Designated Officers for Complaint Resolution –

Name	Designation	Email ID
Vaibhav Modi	Complaint Redressal Officer	vaibhav@chiratae.com
Swaminathan Shankar	Complaint Redressal Appellate Officer	swami@chiratae.com

- Both the officers has been given sufficient authority to resolve the complaint and access to other officials and records to be able to handle the complaint in a fair and impartial manner.
- All Complaints from the investors, distributors, regulators or any other relevant stakeholders should be diverted to the Complaint Redressal Officer.
- Complaints can be lodged either in writing, or email or via telephone calls.

Address of the Investment Manager

Chiratae Ventures Offshore Manager LLP
 Attention to: Compliance Officer/Principal Officer
 Unit No. GA 07, Ground Floor, Pragma Accelerator, Block 15, Zone 1,
 Road No. 11, Processing Area, Gift SEZ, Gift City, Gandhinagar - 382355

Email: compliance.IFSC@chiratae.com

Telephone: +91 9699562556

- Personnel of any other department should not attempt to respond to or settle complaints or disputes on their own.
- The Complaint Redressal Officer should make an assessment on merit of the complaints and should acknowledge the acceptance of complaints in writing within three working days of receipt of the complaint. However, acknowledgement of mail/courier will be done within twenty-four hours.

- If the complaint is not accepted, the Complaint Redressal Officer shall inform the complainant within five working days along with reasons for rejection. The following shall not be considered as complaint:
 - Anonymous complaints (except whistleblower complaints)
 - Incomplete or un-specific complaints
 - Allegations without supporting documents
 - Suggestions or seeking guidance/explanation
 - Complaints on matters not relating to the financial products or services provided by the Firm
 - Complaints about any unregistered/ un-regulated activity
 - References in the nature of seeking information or clarifications about financial products or services.

- The Complaint Redressal Officer shall examine and process the complaint in a fair, transparent, professional and impartial manner. He can also consult Complaint Redressal Appellate Officer of Designated Partners during the process.

- If Complaint Redressal Officer is involved in the conduct of financial transactions which is the subject matter of the complaint, the complaint shall be handled by Complaint Redressal Appellate Officer or Designated Partner in fair and impartial manner.

- The Complaint Redressal Officer shall resolve preferably within fifteen (15) working days (but no later than thirty days from acceptance) and provide appropriate response to the complainant.

- If a complainant is not satisfied with the resolution provided by the Complaint Redressal Officer or if the complaint has been rejected by him, the complainant may file an appeal before the Complaint Redressal Appellate Officer within twenty-one days from the receipt of decision from the Complaint Redressal Officer.

- The Complaint Redressal Officer shall analyse the complaint, may be discuss it with the Designated Partners and dispose of the appeal within thirty days from the receipt of the complaint.

- Without prejudice to anything stated above, the investor may further share their grievance/complaint with IFSCA on grievance-redressal@ifsc.gov.in within twenty one days from the receipt of decision from the Firm.

- Complaint Redressal Officer shall maintain all records relating to handling of complaints, including the following:

- Complaints received and processed;
 - All correspondence exchanged between the Investment Manager and the complainants;
 - All information and documents examined and relied upon by the Investment Manager while processing of the complaints;
 - Outcome of the complaints;
 - Reasons for rejection of complaints, if any;
 - Timelines for processing of complaints; and
 - Data of all complaints handled by it.
- The Records shall be maintained at least for six months. 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.
 - The record of all complaints and responses received by the Investment Manager will be duly maintained by the Complaint Redressal Officer/Compliance Officer. The Investment Manager may develop an online complaint-handling system depending on the nature, scale, and complexity of its business.
 - The Investment Manager will submit periodic reports on complaint handling and grievance redressal as per IFSCA requirements.
 - The Investment Manager will have a section with heading “Complaint Handling and Grievance Redressal” in its Annual Report. The section shall also provide data of all complaints received, resolved, rejected and pending during the year in a tabular/ graphical format or it shall display the information on complaint handling on its website or on a dedicated webpage of its Group Entity, as applicable, under the heading “Complaint Handling and Grievance Redressal”, on an annual basis.
 - The Investment Manager may consult legal counsel to discuss the applicability of the above clause/policy requirements (As per IFSCA circular dated December 02, 2024).
 - The Complaint Redressal Appellate Officer shall periodically review grievance trends/the investor complaints received and update the Designated Partners during their meetings.
 - The Complaint Redressal Officer shall be responsible for ensuring adherence to this policy. The Policy will be reviewed annually or as required by changes in regulations and approved by Designated Partners.

Compliance Officer

Any questions regarding the Complaints Handling and Grievance Redressal Policy can be directed to Vaibhav Modi at Vaibhav@chiratae.com