

GRIEVANCE REDRESSAL POLICY

True Beacon Investment Advisors LLP

Registered with the Securities and Exchange Board of India as a Portfolio Manager

with effect from 9 March 2022 Registration No. INP000007353

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INTRODUCTION

- 1.1 True Beacon Investment Advisors LLP (“**Portfolio Manager**” or “**we / us**”) has been constituted under the Limited Liability Partnership Act, 2008 and registered with Securities and Exchange Board of India (“**SEBI**”) as a portfolio manager under the SEBI (Portfolio Managers) Regulations, 2020 (“**PM Regulations**”) with effect from 9 March 2022 bearing registration number INP000007353. By virtue of this registration, the Portfolio Manager is a registered intermediary with SEBI under Section 12 of the SEBI Act, 1992.
- 1.2 In this Grievance Redressal Policy (“**Policy**”), words and expressions shall, unless expressly defined herein, have the meaning ascribed to them in the disclosure document prepared by the Portfolio Manager in accordance with the PM Regulations and filed with SEBI (“**Disclosure Document**”) or respective portfolio management agreements executed between the Portfolio Manager and respective Clients in accordance with the PM Regulations (“**PMS Agreement**”).

PURPOSE

- 2.1. Client service is a vital element for sustained business growth, and we want to ensure that our clients receive exemplary service across different touch points of their association with us. Prompt and efficient service is essential to retaining existing relationships and therefore client satisfaction becomes critical to us. Client queries and complaints constitute an important voice of clients, and this Policy details grievance handling through a structured grievance redressal framework.
- 2.2. This Policy sets out the policy that will be followed by the Portfolio Manager in the event of a client grievance. Grievances include allegations such as failure to disclose conflicts of interest, misrepresentations, etc. and complaints regarding processing of drawdown transactions, distribution of units etc. Client feedbacks, queries/clarifications, certain information requests will not be considered as instances of complaint or grievance.

OBLIGATIONS OF THE PORTFOLIO MANAGER

- 3.1. The Portfolio Manager will endeavour to address client grievance in a swift and effective manner within a time period of 30 (thirty) business days from the date the grievance is raised. It will also aim to prevent the occurrence of similar grievances in the future.
- 3.2. The Portfolio 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:
 - 3.2.1. Clients are treated fairly, reasonably, and justly;
 - 3.2.2. Client complaints and grievances are dealt with courteously and an attempt is made to resolve issues in a time-bound manner;
 - 3.2.3. Client confidentiality and privacy is maintained; and
- 3.3. Client is periodically informed about the status and actions taken.
- 3.4. The Portfolio Manager will inform the clients regarding the following options available for grievance redressal:

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3.4.1. Registration of complaint on the SEBI Complaints Redress System (“SCORES”) website, as provided below in **Clause 5.4.3**:

- a. with the Portfolio Manager through email/ letter; or
- b. with SEBI through posting on the SCORES website; and

3.2.4. Dispute resolution mechanism, as provided below in **Clause 5.4.4**.

GRIEVANCE REDRESSAL FRAMEWORK

4.1. Procedure 1

4.1.1. Client queries and complaints arise due to lack of understanding, or a deficiency of service experienced by clients. 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 clients.

4.1.2. Clients can seek clarifications to their query and are further entitled to make a complaint in writing, orally or telephonically. Clients are requested to approach only the Portfolio Manager directly, and in the normal course can expect a response within 10 business days of the query or complaint registration.

4.1.3. **Contact Centre:** Clients can call the Portfolio Manager’s client grievance number at +91 +91 9663903202 on any business day between 9.00 am and 6.00 pm to provide feedback or to register their queries or complaints.

4.1.4. **Email:** Clients can register their query/ complaint at wealth.compliance@truebeacon.com

4.1.5. **Letter:** Clients can write to the Portfolio Manager with their query/ complaint at the registered office address as mentioned here: JW Marriott, Level 1, 24/1, Vittal Mallya Road, Bengaluru 560001, Karnataka, India.

4.2. Procedure 2

4.2.1. Clients can also independently address complaints or grievances to Ms. Tanvi Sheth, Grievance Officer (“GO”) in case they are not satisfied with the responses received as per Procedure 1 above at: Email – tanvi@truebeacon.com , Contact Details - +91 9663903202.

4.2.2. The GO, upon being made aware of the complaint, shall look into the grievance handling process and shall ensure that the complaints or grievances received from clients are resolved without prejudice in good faith and in the best interests of our clients thus ensuring retention of clients’ confidence. The client can expect a reply within 7 (seven) business days of approaching the GO.

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4.3. Procedure 3

- 4.3.1. The clients may register their complaint on the SCORES website (www.scores.gov.in).
- 4.3.2. The clients will have an alternate option to register their complaints directly to SEBI on the SCORES website. The Portfolio Manager will obtain the SCORES user id and password by registering for the same.
- 4.3.3. Upon receiving complaints through the SCORES platform, the GO will ensure its resolution within 30 (thirty) calendar days of submission of such complaint. During such period, the client will be kept duly informed of the status and actions taken.

4.4. Dispute Resolution Mechanism

Any complaints/ disputes not resolved to satisfaction of clients per the above grievance redressal framework will be resolved by settlement through conciliation and arbitration process as may be agreed under the respective PMS Agreements of the clients.

REVIEW OF POLICY

This Policy will be reviewed in light of the changes in regulatory framework or for business or operational reasons.