

COMPLAINT HANDLING AND GRIEVANCE REDRESSAL POLICY

Document Control	
Title	COMPLAINT HANDLING AND GRIEVANCE REDRESSAL POLICY
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Version Summary

Version	Policy	Reviewed Date	Next Review Date	Department	Approved by
V1	Complaint Policy	First Policy	--	Compliance	Board of Directors

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1. TITLE

Dovetail Investment Management India (IFSC) Private Limited (hereinafter referred to as “DIMI” or “Company”), is the Fund Management Entity (FME) registered under International Financial Services Centres Authority (IFSCA) (Registration No.- IFSCA/FME/II/2023-24/031 dated August 14, 2023) as Registered FME (Non-Retail). DIMI act as a Fund Management Entity for Funds and/or schemes that it launches from time to time and authorised by IFSCA.

2. PREAMBLE & OBJECTIVE

This Compliant Handling and Grievance Redressal Policy (“Policy”) is made in compliance with the Circular no. F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 02, 2024, issued by IFSCA for all the regulated entities in the IFSC. The Policy aims to protect the interests of consumers and ensure that complaints are handled effectively, transparently, and within the stipulated timeframes.

This Policy applies to Dovetail Investment Management India (IFSC) Private Limited (“DIMI”), its clients, and the consumers of the funds launched by the Company.

3. DEFINITIONS:

- (a) **Authority:** means the International Financial Services Centres Authority (“IFSCA”) established under sub-section (1) of section 4 of The International Financial Services Centres Authority Act, 2019
- (b) **Complaint:** A communication expressing dissatisfaction with the financial products or services offered by the Company/LLP.
- (c) **Non-Complaint Communications:** Includes the following:
 - i. Anonymous or incomplete communications.
 - ii. Suggestions, guidance requests, or clarifications.
 - iii. Matters unrelated to Company/LLP products or services.
- (d) **Query or Request:** Communication seeking information or clarification, which will not be classified as a complaint unless unresolved within the stipulated turnaround time.
- (e) **Consumer:** Any client or customer of Company/LLP, as defined under applicable IFSCA Guidelines.
- (f) **Complaint Redressal Officer (CRO):** An employee responsible for handling complaints received from consumers.
- (g) **Complaint Redressal Appellate Officer (CRAO):** A senior-level official responsible for appeals against decisions made by the CRO and/or Principal Officer.

4. CLASSIFICATION OF COMMUNICATION:

(a) What is a Complaint?

- Communications that explicitly express dissatisfaction with Company's/LLP's financial products or services.
- Complaints that meet the criteria for valid submission (e.g., supported with necessary details).

(b) What is Not a Complaint?

- Anonymous communications (excluding whistleblower reports).
- Suggestions or general inquiries.
- Allegations unsupported by documentation.
- Requests for clarification or additional information.

➤ General Principle for classification of consumers communication

- a. If a query is resolved after the stipulated turnaround time and there is no reminder from the consumer during such time period, such query will not be treated as complaint.
- b. In case of any ambiguity, the CRO/Compliance Officer shall be the sole authority to decide on the nature and classification of the communication and the decision of the CRO/Compliance Officer shall be final and binding.
- c. Multiple correspondence / communications or reminders received for the same matter within the stipulated turnaround time in this Policy for handling of the query / communication will be treated as one complaint

5. COMPLAINT RECEIPT:

Complaints can be submitted to Company's/LLP's Compliance Officer designated as Complaint Redressal Officer (CRO) through the following channels:

- Email: compliance.dimi@dovetailindia.com
- Phone: +91 6357283747
- Mail: Unit no. 1130, 11th Floor, Signature Building, Block 13-B, Zone-1, GIFT City, GIFT SEZ, Gandhinagar-382355

All complaints must include:

1. Consumer's name and contact details.
2. Detailed description of the issue.
3. Supporting documents, if applicable.

6. COMPLAINT HANDLING PROCEDURE:

6.1 Acknowledgment

Complaints will be acknowledged within **3 working days** of receipt via the same channel through which they were received.

6.2 Acceptance or Rejection

• Accepted Complaints:

- Compliance Officer will notify the complainant of acceptance and initiate the resolution process.
- Resolutions by CRO will be provided within **15 working days**, and no later than **30 working days**.

• Rejected Complaints:

- Complainants will be notified within **5 working days**, with reasons for rejection.

6.3 Escalation Process

If the complainant is dissatisfied with the resolution:

• Escalation Level 1: Escalate to CRAO:

- Submit an appeal to CRAO at Compliance.GIFT@dovetailindia.com within **21 working days** of the decision by the CRO/Compliance Officer or in case of no response from the CRO/Compliance Officer.
- The CRAO will resolve the appeal within **30 days** of receipt.

• Escalate to IFSCA:

- If unsatisfied after CRAO's review, the complainant may approach the IFSCA at grievance-redressal@ifsc.gov in within **21 days** of the CRAO's decision.

6.4 Timelines Summary

1. **Acknowledgment:** Within 3 working days.
2. **Initial Resolution:** Within 15 working days, not exceeding 30 days.
3. **Escalation Resolution to CRAO:** Within 21 days of CRO's decision
4. **Final Appeal to IFSCA:** Within 21 days of CRAO's decision.

7. RECORD MAINTENANCE:

Company/LLP will maintain following records electronically for **6 years** or longer if required for legal proceedings. The records will be made available for audits and regulatory reviews.

- a. Complaints received and processed.
- b. All correspondence exchanged between the Regulated Entity and the complainants.
- c. All information and documents examined and relied upon by the Regulated Entity while processing of the complaints.
- d. Outcome of the complaints
- e. Reasons for rejection of complaints, if any.
- f. Timelines for processing of complaints; and
- g. Data of all complaints handled.

8. REPORTING AND DISCLOSURE

- 8.1 Complaint statistics, including resolved, pending, and escalated complaints, will be included in Company's/LLP's Annual Report and prominently displayed on its website on an annual basis.
- 8.2 Company/LLP will submit periodic reports to IFSCA, as required by regulations.

9. CONTACT DETAILS

It details the designated points of contact at each level, starting with the initial point of contact for submitting a complaint, and progressing through higher levels for escalation of complaints. The matrix for complaint/grievance redressal flow is as provided below:

Level 1	Compliance Officer/Compliance Redressal Officer (CRO) Address: Unit No. 1130, 11th Floor, Signature Building, Block 13-B, Zone-1, Gift City, Gandhinagar - 382355, Gujarat, India Email ID: compliance.dimi@dovetailindia.com
Level 2	Principal Officer/ Complaint Redressal Appellate Officer (CRAO) Address: Unit No. 1130, 11th Floor, Signature Building, Block 13-B, Zone-1, Gift City, Gandhinagar - 382355, Gujarat, India Email ID: compliance.gift@dovetailindia.com

Level 3	The complainant may file a complaint before the Authority through email to grievance-redressal@ifsc.gov.in preferably within 21 days from the receipt of the decision.
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10. MISCELLANEOUS

1. The Policy will be reviewed periodically to ensure compliance with regulatory updates.
2. The Board of Directors will approve amendments.

This Policy shall be effective from January 15,2025.