

ChrysCapital Associates LLP

Grievance Redressal Policy

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A. Introduction

ChrysCapital Associates LLP (hereinafter referred to as 'LLP or 'Investment Manager') acts as an Investment Manager and Sponsor to Clarus Trust a SEBI registered Category III Alternative Investment Fund bearing registration number IN/AIF3/21-22/0899.

The Grievance Redressal policy outlines the grievance handling process through a structured grievance redressal framework. Investor inquiries and complaints are a significant voice for the Investors and a prompt and effective service is crucial for maintaining existing partnerships. The LLP has established principles and framework to handle both queries and grievances to ensure that:

- a. All Investors are treated in a fair and equitable manner.
- b. Complaints raised by Investors are dealt in a time bound manner.
- c. Investors are provided with information on how to raise their issues and complaints and escalate if they are not satisfied with the resolution or handling.
- d. A dedicated Customer Services Team is in place to handle customer queries and complaints. The process is supervised by a senior resource.

B. Grievance Raising Mechanism

The Investment Manager shall have a structured internal policy mechanism to process and effectively redress any investor grievances in relation to the Fund, in the best manner possible. The Investment Manager will also aim to prevent the occurrence of similar grievances in the future.

The Investment Manager will ensure that appropriate resources are dedicated for redressal of issues and queries in a timely manner.

1. The client having grievance to first take up the matter directly with the LLP. Investors are entitled to make a complaint either in writing, orally or telephonically. Investors that are serviced by their independent advisors or distributors can also raise their complaints through their advisors and distributors.
2. The below personnel of the LLP shall attend to and address any Client query or concern as soon as practicably possible:

Name	Rakesh Kar
Telephone	+91 22 4066 8006
Email	rakesh@chryscapital.com

3. The LLP shall redress the grievance within 21 (Twenty-one) calendar days from the date of receipt of the complaint.
4. Alternatively, an investor may also use SCORES (<https://scores.sebi.gov.in>) to submit the complaint or grievance directly to the LLP for resolution.

SCORES registration number are as under:

- Clarus Trust – **aif00789**

5. If Client/s are still not satisfied with the response from the LLP, they can lodge their grievances with SEBI at <https://scores.sebi.gov.in> or may also write to any of the offices of SEBI or contact SEBI Office on Toll Free Helpline at 1800 266 7575 / 1800 22 7575. The complaint shall be lodged within one year from the date of cause of action, where:
 - The complainant has approached the Investment Manager for redressal of the complaint and the Investment Manager has rejected the complaint or,
 - The complainant has not received any communication from Investment Manager or,
 - The complainant is not satisfied with the reply received or the redressal action taken by the Investment Manager.
6. If the Client is not satisfied with the extent of redressal of grievance by the LLP, there is a one-time option for “Compliant review Facility” of the extent of the redressal, which can be exercised within 15 days from the date of closure of the complaint on SCORES. Thereafter, the complaint shall be escalated to the supervising official of the dealing officer of SEBI.
7. After exhausting all aforementioned options for resolution, if the client is not satisfied, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at <https://smartodr.in/login>.
8. Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with the LLP is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.
9. The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in SCOREs guidelines or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law (including when moratorium under the Insolvency and Bankruptcy Code is in operation due to the insolvency process or if liquidation or winding up process has been commenced against the Investment Manager).
10. The process on Online Dispute Resolution Mechanism is available on website of the LLP at <http://claruscapital.in>

C. Process to register a complaint.

- Investors who wish to lodge a complaint on SCORES (complainant) are required to register themselves on www.scores.gov.in by clicking on “Register here” under the “Investor Corner”.
- While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email Id, Aadhaar card number (optional), Central KYC (CKYC) ID (optional) etc. are required to be provided for effective communication and speedy redressal of the grievances.
- Upon successful registration, a unique user id and a password shall be generated and communicated through an acknowledgement email to the complainant.

- If the Investor is unsatisfied, then he may register the same on ODR portal. The Investor will have to register themselves on <https://smartodr.in/login> by clicking “Create one here” under “Investor Login”.
- While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email Id, Address are required to be provided.
- Upon successful registration, you will receive an email on the registered email address with a link to verify your account.

D. Display of Complaints Data:

The details of the complaints including SCORES complaints shall be disclosed in the Private Placement Memorandum (PPM) of the Fund in the format provided in **Annexure A** or such other format as may be prescribed by SEBI from time to time.

E. Management Information System (MIS) report of Investor Complaints:

A MIS report of the complaints received, pending, and resolved during the Quarter will be placed before the Designated Partner of the LLP, at regular intervals for their review and information.

F. 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 by the Compliance Officer team 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.

G. Review of Policy

After verification and scrutiny of the complaint, appropriate steps shall be initiated to resolve the complaint. The Compliance Officer shall endeavor to resolve the investor’s complaint within 21 days from the date of receipt of the complaint. The Investor Relations Officer regularly reviews the complaints according to its nature like gaps in the process / understanding, client servicing issue, system related issue etc. and on the basis of such analysis, informs the Management / concerned team to take adequate steps to strengthen the internal processes, control or systems, as the case may be, to avoid the repeat of the same nature of complaint in the future. The policy would be reviewed on a periodic basis or as and when considered necessary by the Designated Partners of the LLP.

Annexure A

Clarus Trust

i. Investor complaints data for the quarter ending (March/June/September/December)

S. No.	Investor Complaints received from	Pending as at the end of the last quarter	Received	Resolved	Total Pending at the end of the quarter	Pending complaints > 3months	Average Resolution time ^ (in days)
1.	Directly from Investors						
2.	SEBI (SCORES)						
3.	Other Sources (if any)						
	Total						

^Average resolution time is the sum total of time taken to resolve each complaint in days in the currentquarter divided by total number of complaints resolved in the current quarter.

II. Investor complaints data for last three Financial Years (FY)

S. No.	FY	Carried forward from previous FY	Received	Resolved	Pending at the end of FY
1.	2021-22				
2.	2022-23				
3.	2023-24				
	Total				

^Average resolution time is the sum total of time taken to resolve each complaint in days in the currentquarter divided by total number of complaints resolved in the current quarter.