

CCV INVESTMENT MANAGERS LLP

Background:

CCV Investment Managers LLP (hereinafter referred to as CCV IM) is the investment manager of CCV Emerging Opportunities Fund (hereinafter referred to as the “Fund”) registered with the Securities and Exchange Board of India (SEBI) as a category -III (Open- ended) under SEBI (Alternate Investment Fund) Regulations, 2012.

CCV Investment Managers LLP places interests of the clients above their own personal interests and considers investors interests to be the interest of the Organization. We also ensure that investor service is paramount and shall be treated with the utmost importance. We strive to connect with the investor directly and address the issue with appropriate solution and time. In order to provide efficient and timeless service, we had adopted One-on- One Contact service as our model for investor service. This policy was approved by the Designated Partners in their meeting held on 08th day of April 2024. This is a revised policy as per July, 01, 2024 including the amendment of PIT Regulations on 26, June, 2024.

Applicability:

This policy is applicable to all the employees of the Organization. The Compliance Officer shall ensure that the investor grievances are addressed timely.

Grievance Redressal Policy:

The policy outlines the grievance handling process structured for efficient resolution. This policy outlines the framework and principles for efficient redressal of investor grievances.

- i. Investors are treated equitably and honorably at all times.
- ii. All the investor’s complaints are honored, irrespective of the nature of the complaint.
- iii. The investors are provided broad avenue, where they can raise their complaints directly with the compliance officer.
- iv. The employees of the Investment Manager shall work in good faith and without prejudice to the interests of the investors.
- v. The investors are also informed about raising their complaints and grievances, along with the escalation route until they are redressed.

Grievance Raising Mechanism:

Investors at the time of contribution to the fund entitles the right to raise grievance with the Investment Manager and shall expect the redressal of the same in a brief period of time.

SCORES:

1. The investors shall raise grievances/ complaints to CCV Investment Managers LLP at support.aif@ccvindia.com and complianceofficer.aif@ccvindia.com or 9789150288 or shall be sent on registered post to 102, First Floor, Udyog Sheel Mahila Sehkari Samiti US Complex, New Delhi- 110076, at first place as directed by SEBI.

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2. The said complaint shall be resolved within fifteen (15) working days by the CCV Investment Managers LLP.
3. In the case of, the dissatisfaction on the redressal of such complaint, then the investor shall escalate the same to Securities Exchange Board of India by lodging their grievance in the <https://scores.sebi.gov.in/> or may also contact SEBI office helpline at 1800 266 7575/ 1800 22 7575. The complaint shall be lodged on SCORES web portal by registering themselves on the portal providing basic mandatory details of the investor like Name, Address, PAN, mobile number and email id.
4. The investor shall lodge their complaint on the portal within a year, from the date when the investor has approached CCV for redressal of their grievance and
 - The solution provided by the CCV is not satisfactory (or)
 - The investor hasn't received any response from CCV's end
5. After registering a complaint with the SCORES platform, then the complainant shall expect an Action Taken Report from the CCV's side which shall be uploaded by CCV on the SCORES platform within ten (10) working days and the same shall be automatically routed to the complainant.
6. After receiving the said ATR, the complaint shall be deemed to be disposed, if the complainant hasn't replied for the said ATR within fifteen (15) days from the day when complainant has received ATR, as it shall be understood that the complainant is satisfied or the complainant doesn't want to seek for a first review on the ATR uploaded by the CCV.
7. If the complainant is dissatisfied, then they shall opt for the first level review in the SCORES portal, which shall escalate the complaint to the Designated body of AIF; or, hasn't received any response on the said complaint from CCV, then the same shall also be auto escalated to Designated body: then in both the cases, the complainant shall be escalated within fifteen (15) days, after the completion of twenty one (21) days of filing the said complaint.
8. After the escalation, the Designated body is supposed to file an Action Taken Report in the portal within ten (10) days from the day of escalation, or shall be auto escalated, if there is no reply from designated body (or) if the complainant is not satisfied with the same, then, the same shall be posted for second-level of review to SEBI within fifteen (15) days.
9. The SEBI shall seek clarification from the Designated body/ CCV on the said ATR submitted and shall produce the same to the complainant along with the closure remarks on the complaint made by the complainant.
10. The investor at any point of time shall opt for Online Dispute Resolution (ODR), but it shall not go simultaneous with the grievance raised in the SCORES platform.
11. The investor shall opt for ODR after any stage of the complaint in the SCORES, or after the disposal of the grievances from the SCORES system.

Online Dispute Redressal platform:

1. The Investor shall register their complaints in the <https://smartodr.in/login> portal, by doing a simple registration in the aforesaid portal, under "investor login", by

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providing the required details like Name, PAN, contact details, email id, Address of the investor.

2. The investor after registering themselves, shall register a dispute on the platform, on CCV.

Contact Details:

Name and address	Mr. Subha Mohan S
Email id	complianceofficer.aif@ccvindia.com
Phone number	+91- 9789150288

Maintenance of Records:

1. A Management Information System (MIS) is maintained for the investor complaints since the CCV Investment Manager's inception on all the AIFs managed by the CCV.
2. The MIS shall include all the data of the complaint and several stages of the complaint and shall also record the timeline took by the CCV in resolving the complaint for every stage separately.
3. The soft/ hard copies of the complaints are preserved by the compliance officer, irrespective of its maintainability record.
4. The compliance officer shall also preserve the Action Taken Report (ATR), for the said complaint.

Review of Policy:

The policy is approved by the Partners of CCV Investment Managers LLP, and if any changes are warranted then, the revised policy shall be placed before them for review and approval. The observations or comments of chief of internal audit shall be taken in to account where the partners find it necessary. The policy shall be reviewed once in a year by the Compliance Officer and one of the partners of CCV.