

# Nepean Capital LLP

## GRIEVANCE REDRESSAL POLICY

### A. Introduction

Nepean Capital LLP (hereinafter referred to as 'Nepean') acts as an Investment Manager to SEBI registered Category II & III Alternative Investment Funds under SEBI (Alternative Investment Funds) Regulations, 2012. Further, Nepean undertakes Investment Advisory Services under SEBI (Investment Advisers) Regulations, 2013.

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. Nepean 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 timebound 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. The process is supervised by a senior resource.

### B. Grievance Raising Mechanism:

Investors are entitled to make a complaint in writing, orally or telephonically directly to Nepean. Investors that are serviced by their independent advisors or distributors can also raise their complaints through their advisors and distributors.

1. For complaints related to AIF & IA, the Investors can directly reach Nepean through email at: [admin@nepeancapital.com](mailto:admin@nepeancapital.com)
2. Investors can contact Nepean through telephone at: +91 22 4923 4221/22
3. Investors can send letters to Nepean at:  
Nepean Capital LLP  
1106 Regent Chamber,  
Nariman Point,  
Mumbai – 400021
4. If Investors are unsatisfied or haven't received a reply within 10 business days of submitting the complaint, the Investor may reach out to Nepean Compliance department at [varun.nandwana@nepeancapital.com](mailto:varun.nandwana@nepeancapital.com)  
The Investor can expect a reply within 10 business days of approaching Nepean Compliance department.
5. Alternatively, Investor may use SCORES (<https://scores.gov.in/scores/Welcome.html>) to submit the complaint or grievance directly to Nepean for resolution.
6. Clients can also visit SMART ODR Portal to file a dispute on [SMARTODR \(https://smartodr.in/login\)](https://smartodr.in/login)
7. Nepean shall endeavour to redress the Investor complaint(s) within 30 days without any intervention of SEBI, failing which the complaint shall be registered on SCORES.

8. It is mandatory for the Investor having grievance to take up the matter directly with Nepean.
9. If Investors are still not satisfied with the response from Nepean, they can lodge their grievances with SEBI at <https://scores.gov.in/scores/Welcome.html> 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 on SCORES within one year from the date of cause of action, where,
  - The complainant has approached Nepean, for redressal of the complaint and,
  - Nepean has rejected the complaint or,
  - The complainant has not received any communication from Nepean or,
  - The complainant is not satisfied with the reply received or the redressal action taken by Nepean.
10. SCORES may be accessed through SCORES mobile application as well, same can be downloaded from below link: <https://play.google.com/store/apps/details?id=com.ionicframework.sebi236330> <https://apps.apple.com/in/app/sebiscores/id1493257302>. If the investor is not satisfied with the extent of redressal of grievance by Nepean, there is a one-time option for 'review' 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.
11. 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>

Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with the Investment Manager is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.
12. Any complaints/disputes not resolved to the satisfaction of investors as per the above grievance redressal framework will be resolved by settlement through conciliation and arbitration process, under the Arbitration and Conciliation Act, 1996, as may be agreed under the respective Contribution Agreements/ Client Agreements of investors.

#### **C. Contact for assistance in filing complaints:**

- The Investors may contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on SCORES.
- The list of IAs are available on SEBI website ([www.sebi.gov.in](http://www.sebi.gov.in)).
- Investors may also seek assistance in filing complaints on SCORES from SEBI's toll free helpline number 1800 266 7575 or 1800 22 7575.

#### **D. 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](http://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 Investors will have to register themselves on <https://smartodr.in/login> 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, the investor will receive an email on the registered email address with a link to verify his/her account.

#### **E. Internal Grievance Redressal Process:**

The Customer Services Team receiving the query/complaint is responsible for the resolution of query/complaint. The Assistant Finance Manager at the first level is responsible for ensuring that the query / complaint is resolved to the investor's satisfaction and must attempt to offer the investor alternate solutions, however if the investor remains unsatisfied with the resolution, he can escalate the issue through the grievance redressal mechanism as mentioned above.

Queries and complaints are investigated at the various levels of escalation as maintained by Nepean, within the time frame allotted. The investor is informed of the turnaround time for specific sorts of questions or complaints that require additional time for inquiry in case they involve fraud, legal considerations, or input from a third party. It is crucial that Nepean promptly communicates its position on any topic, and it does so in a transparent and investor-friendly manner.

#### **F. Display of Complaints Data:**

The details of complaints shall be provided in the private placement memorandum of the schemes of Nepean AIF within one month of end of each financial year.

#### **G. Management Information System (MIS) report of Investor Complaints:**

A MIS report of the complaints received, pending, and resolved will be placed before the Partners of the Nepean, at regular intervals for their review and information.

#### **H. 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 Customer Services 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.

#### **I. Review of Policy:**

The Policy should be placed before the partners and if any changes in the policy are warranted, the revised policy should be placed before the partners for review and approval. The policy will be reviewed once in a year by the Principal Officer/ Compliance Officer and one of the Partner(s).

A copy of this policy is made available at <https://nepeancapital.com/>