

INVESTOR GRIEVANCE REDRESSAL POLICY

Paragon Advisor Partners LLP

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I. BACKGROUND

Paragon Advisor Partners LLP (“Paragon”) is registered with the International Financial Services Centres Authority ('IFSCA') to operate as a Fund Management Entity ('FME') under the Non-retail Category in accordance with the IFSCA (Fund Management) Regulations 2022 ('FME Regulations') and will manage /manages Alternate Investment Funds.

The FME believes that service to the contributor of the Fund i.e. investor / client is a vital element for sustained business growth and ensures that contributors receive exemplary service. Prompt and efficient service is essential for retaining existing relationships and therefore, contributors' satisfaction is paramount. Queries and complaints constitute an important aspect, and this policy details grievance handling process through a structured grievance redressal framework. Grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in future.

Grievances include allegations such as failure to disclose conflicts of interest, misrepresentations, etc. and complaints regarding processing of drawdown transactions, discriminatory treatment among various classes of unit holder, distribution of units etc. Investor feedbacks, queries/clarifications will not be considered as instances of complaint or grievance.

II. OBJECTIVES OF THE POLICY

The Fund will endeavour to address client grievance in a swift and effective manner within a reasonable time period from the date the grievance is raised. Additionally, efforts will be made to prevent similar grievances from arising in the future.

The Fund will ensure that the policy is geared towards achieving the following objectives:

- Contributors are treated fairly, reasonably, and justly;
- Contributor confidentiality and privacy is maintained;

III. IFSCA REQUIREMENTS

As per the FME Regulations, the compliance officer as appointed by the FME for the Fund shall seek to attend to and address any investor query/concern/grievance immediately.

The FME should ensure that this official is vested with the necessary authority and independence to handle complaints received from the Investors.

Further to this the Principal Officer of the Fund shall periodically review the investor complaints received and shall ensure immediate redressal of the same by the FME.

IV. GRIEVANCE REDRESSAL MECHANISM

Investors may raise their complaints/ grievances through the following modes:

- Registering the complaint with the Compliance Officer of the Fund through email/letter.
- Registering the complaint with International Financial Services Centre Authority ('IFSCA') and

Dispute resolution mechanism, as provided below

Step 1: Registration and Acknowledgement of complaint

- Investors can contact Ms. Hemangi Panchal ("Compliance Officer") for any queries and complaints.
- A complaint can be registered by the Investor by contacting the Compliance Officer via email or letter as mentioned below:
 - Email:<hemangi@paragonpartners.in>
- Registered Office address – Shilp Incubation Centre, Office No SI-M-Coo7, Unit B, First Floor, Plot No 11T3 & 11T5, Block 11, GIFT SEZ, GIFT City, Dist. Gandhinagar,-382355. Any complaints received will be directed and acknowledged by the Compliance Officer. The Compliance Officer shall share the acknowledgement with the investor raising such grievance within 2 days of receipt of such complaint as a confirmation for such registration. This acknowledgement reference number will also help in tracking the progress/ status of the grievance.
- The Compliance Officer will strive to address all complaints and provide redressal within 10 business days.
- The Compliance Officer will keep the Investors duly informed of the status and actions taken.

Step 2: Escalation level 1: Registration of complaint with Principal Officer

In case the Compliance Officer does not respond/resolve the complaint within 10 days from the date of receipt of such complaint or if the investor is not satisfied with the resolution or the manner in which grievance is being addressed, it can be escalated to the **Principal Officer** through:

- Email: <sanjay@paragonpartners.in>
- Registered Office address - Shilp Incubation Centre, Office No SI-M-Coo7, Unit B, First Floor, Plot No 11T3 & 11T5, Block 11, GIFT SEZ, GIFT City, Dist. Gandhinagar,-382355

Step 3: Escalation level 2: Registering of complaint with International Financial Services Centre Authority ('IFSCA')

Complaints will be investigated and redressed within reasonable time from the date of receipt of complaint. Certain types of complaints, involving fraud, legal inputs and third party will be acknowledged and the turnaround time will clearly be communicated to the investor accordingly. The prompt communication of the Fund's stand on any issue is important and is done clearly in an investor friendly manner. Further, if the investor is not satisfied with the resolution or the manner in which grievance is being addressed, then he/she may also escalate the issue to the International Financial Services Centre Authority by contacting the concerned officers in the Investment Division of the Capital Market Department through email or phone mentioned at following web address: <https://ifsc.gov.in/Pages/Contents/ListOfOfficers>

V. DISPUTE RESOLUTION MECHANISM

Any complaints or dispute not resolved to satisfaction of contributors per the above grievance redressal framework will be resolved by settlement through conciliation or arbitration process as may be agreed under the respective agreements with the contributors.

VI. RECORD KEEPING

The Fund will ensure quarterly compilation of the records of investor complaints received against the

Fund and redressal status thereof within 7 days from the end of each quarter.

All records pertaining to investor grievances received by the Fund and redressal of such grievances will be maintained by the Fund at all times.

VII. REPORTING AND DISCLOSURE

The Fund will comply with the applicable FME Regulations updated from time to time vis-à-vis the disclosure requirements applicable to the Fund.

The Fund/ Investment Manager will ensure disclosure of the above grievance redressal mechanism in the PPM of the Fund. Such Grievance Redressal Mechanism as mentioned will also include an option for the investors to approach IFSCA, if required.

VIII. REVIEW OF POLICY

The Policy will be reviewed on at reasonable intervals as may be required, in light of any material changes in regulatory framework or for business or operational reasons. Any subsequent changes will form part of the Policy after the approval of the Designated Partners.