

INVESTOR GRIEVANCE REDRESSAL POLICY

Of

Holani Venture Capital Fund – I

(A scheme of Holani Venture Capital Fund)

Effective Date: April,30 2024

Version 1.0

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A. INTRODUCTION

Holani Capital Advisor LLP (hereinafter referred to as 'HCA LLP) act as an Investment Manager to SEBI registered Category I Alternative Investment Fund Holani Venture Capital Fund - 1 under SEBI (Alternative Investment Funds) Regulations, 2012.

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. HCA LLP has established principles and framework to handle both queries and grievances to ensure that

1. All Investors are treated in a fair and equitable manner.
2. Complaints raised by Investors are dealt in a time bound manner.
3. 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.
4. 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

Investors have the right to submit complaints to HCA LLP in writing, orally, or by telephone.

1. It is mandatory for the Investor having grievance to take up the matter directly with HCA LLP at first place.
2. For complaints related AIF, the Investors can directly reach HCA LLP through email at:

REDRESSAL@HOLANICAPITAL.COM OR [COMPLIANCE @HOLANICAPITAL.COM](mailto:COMPLIANCE@HOLANICAPITAL.COM)

3. Investors can contact HCA LLP through telephone at:

+0141 220 3996

4. Investors can send written complaints to HCA LLP at:

Holani Capital Advisors LLP
Investment Manager
4th Floor, 415, Soni Paris Point
Jai Singh Highway
Bani Park Jaipur 302016,

5. HCA LLP shall endeavor to redress the Investor complaint(s) within such period as may be prescribed by SEBI from time to time from the date of the receipt of the complaint by HCA LLP.
6. If Investors are still not satisfied with the response from HCA 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.

7. 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>.

Scores ID : AIFN00034

If the investor is not satisfied with the extent of redressal of grievance by HCA LLP, 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.

8. 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.

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.

C. CONTACT FOR ASSISTANCE IN FILING COMPLAINTS

1. The Investors may contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on SCORES.
2. The list of IAs is available on SEBI website (www.sebi.gov.in).
<https://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognisedFpi=yes&intmId=17>
3. Investors may also seek assistance in filing complaints on SCORES from SEBIs toll free helpline number 1800 266 7575 or 1800 22 7575.

D. PROCESS TO REGISTER A COMPLAINT.

1. 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”.
2. While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email ID, Aadhar card number(optional), Central KYC (CKYC) ID (optional) etc. are required to be provided for effective communication and speedy redressal of the grievances.
3. Upon successful registration, a unique user ID and a password shall be generated and communicated through an acknowledgement email to the complainant.

4. 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”.
5. 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.
6. Upon successful registration, the investor will receive an email on the registered email address with a link to verify his/her account.

E. HANDLING OF COMPLAINT

1. It will be the duty of Compliance Officer to ensure that the complaints received from investors are redressed earliest and without delay. All the Investor Grievances received are verified and scrutinized by the compliance department.
2. On receipt of the complaint; the Compliance Officer can seek further information from the complainant and also seek any details/information from the concerned department/officials for verification against allegations made in the complaint.
3. If there is no response from concerned department/officials within 7 working days of the complaint, the same is escalated to Managing Director. The Company shall endeavor redressal of routine Investor Grievances within such period as may be prescribed by SEBI from time to time.
4. In case of non-routine complaints and complaints where external agencies are involved, Company may seek additional time from the Investor to redress the Grievances as expeditiously as possible..
5. Once the complaint is resolved/closed, the Compliance Officer gives the sign-off. The Company shall resolve the complaint and upload the Action Taken Report (“ATR”) on SCORES 2.0 within the timeline prescribed as per the SEBI Grievance Redressal circular. The ATR uploaded by the Company will be automatically routed to the complainant.

A. REVIEW OF COMPLAINT

The Compliance Officer regularly monitors and reviews complaints according to its nature, originating branch, against a particular employee etc. and on the basis of such analysis, inform the management to take adequate steps to strengthen the systems. The Managing Director reviews the status of pending complaints. The Internal Auditors review grievances status on a periodic basis. A MIS of the complaints received, pending and resolved during the Quarter are placed before the Board of Directors of the company for their review and necessary advice.

B. MAINTENANCE OF RECORDS

The Complaint Register will be maintained for such period as prescribed by regulatory authority.

C. REVIEW OF THE POLICY

This policy is to be reviewed as & when management thinks fit or whenever changes are mandated by statutory authorities.