uti

Alternatives

Aligned with your interests

Grievance Redressal Policy

(UAPL/IFSC/GRP/V1/08/2026)

(Approved in Board Meeting held on January 19, 2026)

Table of Contents

1. Preface

UTI Alternatives Private Limited ("UAPL") is a wholly owned subsidiary of UTI Asset Management Company Limited ("UTIAMC"). UAPL has established its branch office in GIFT IFSC. The branch office of UAPL is registered with International Financial Services Centres Authority ("IFSCA") as Fund Management Entity ("FME") in accordance with the IFSCA (Fund Management) Regulations, 2025 as amended and restated from time to time.

The Grievance Redressal Policy has been framed in accordance with the IFSCA (Fund Management) Regulations, 2025 and the IFSCA Circular no. F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs dated December 02, 2024. This policy is applicable to the GIFT IFSC Branch of UAPL and its funds.

2. Objective

The purpose of this Policy is to set forth the policies and procedures for establishing a robust, fair, transparent, and time-bound mechanism to be followed in receiving, handling, responding and resolving to any grievance reported by the stakeholders.

The following are broad objectives for handling the stakeholder grievances:

1. To provide fair and equal treatment to all stakeholder without bias at all times.
2. To ensure that all issues raised by stakeholders are dealt with courtesy and resolved in stipulated timelines.
3. To develop an organizational framework to promptly address and resolve grievances fairly and equitably.
4. To provide enhanced level of satisfaction.

3. Key Definitions

a) "Authority" shall mean International Financial Services Centres Authority (IFSCA) established under the IFSCA Act, 2019 as amended and restated from time to time.

b) "Complaint Redressal Appellate Officer" or "CRAO" shall be a shall be a senior level person of the Regulated Entity responsible for handling appeals of consumers against the decision taken by the Complaint Redressal Officer of the Regulated Entity;

c) "Complaint Redressal Officer" or "CRO" shall be an employee of the Regulated Entity responsible for handling of complaints received from its consumers;

d) "Consumer" shall have the same meaning as assigned to "Client" or "Customer" under clause 1.3.11 of the IFSCA (Anti Money Laundering, Counter-Terrorist Financing and Know Your Customer) Guidelines, 2022;

e) "Compliant or Grievance" means and includes any communication that expresses dissatisfaction, in respect of the conduct or any act of omission or commission or deficiency of service on the part of stakeholder(s) on the matters relating to the financial products or services provided by the entity but do not include the following:

    i) Anonymous complaints (except whistleblower complaints)

ii) Incomplete or un-specific complaints
iii) Allegations without supporting documents
iv) Suggestions or seeking guidance/explanation
v) Complaints on matters not relating to the financial products or services provided by the entity
vi) Complaints about any unregistered/ un-regulated activity
vii) References in the nature of seeking information or clarifications about financial products or services

f) "Group Entity" means an entity of a business group that consists of a parent company or of any other type of legal person exercising control over the rest of the group, together with branches and/or subsidiaries;

g) "Non-retail" consumer means a person that is considered as a "non-retail" under the regulatory framework specified by the Authority:
Explanation I: All the investors participating in a scheme launched by a registered FME (Non-retail) or Authorised FME shall qualify as "non-retail" consumers;

4. Obligations of FME

1. FME will endeavor to address grievances or complaints of Contributors in a swift and effective manner within the timelines prescribed under this Policy. It will also aim to prevent the occurrence of similar grievances in the future.

2. FME will ensure that appropriate personnel are designated for grievance redressal in accordance with the Applicable Law and resources are dedicated for redressal of complaints, issues and queries in a timely manner. Specifically, grievance redressal will be geared towards achieving the following outcomes:

   a. Contributors are treated fairly and in an impartial manner, reasonably, and justly at all times;
   b. Complaints and grievances of Contributors are dealt with courteously and every attempt is made to resolve issues in a time-bound manner;
   c. Confidentiality and privacy are always maintained and complaints are dealt with utmost professionalism;
   d. The Contributor is periodically informed about the status and actions taken in respect of its compliant;
   e. The Complaint is examined and processed in a fair, transparent, professional and impartial manner.

The policy on Complaint Handling and Grievance Redressal shall be prominently disclosed on the website of the FME or on a dedicated webpage of its Group Entity, as applicable, under the heading "Complaint Handling and Grievance Redressal". The name and contact details of the Complaint Redressal Officer and the Complaint Redressal Appellate Officer shall also be prominently displayed under this section. The Compliance Officer of the FME shall act as Compliant Redressal Officer and Principal Officer shall act as Compliant Redressal Appellate Officer.

5. Complaint Handling Procedure

(a) Complaints arise due to lack of understanding, or a deficiency of service experienced by Contributors. Deficiency of service may inter alia include lack of explanation, clarifications, understanding which escalates into shortfalls in the expected delivery standards, either due to inadequacy of facilities available or through the attitude of staff towards Contributors. Contributors can seek clarification to their query and are further entitled to make a Complaint in writing in a manner set out herein.

(b) The Contributor can contact the Complaint Redressal Officer ("CRO"), appointed for the purposes of immediate redressal of Complaints of Contributors, to lodge a Complaint through the following modes and shall state the following details:

i. Email: Investors can send an email to Compliance Officer

ii. Letter: Investors can write to the FME with their Complaint at the registered office address as mentioned here:
ATTN: Complaint Redressal Officer
Pragya Accelarator-1, FF-08, Block No. 15, Zone-1, Road No. 11, Processing Area, GIFT SEZ, GIFT City, Gandhinagar-382355, Gujarat

The Complaint shall be signed by the Contributor and shall state the following details:

i. Name, Address, email id of Complainant
ii. Name of fund in which investment has been made by investor
iii. Amount of investment made by investor
iv. The facts of the complaint or grievance.
v. Supporting documents for complaint

(c) On receipt of a complaint, CRO of the FME shall make an assessment on the merits of the complaint. Pursuant to assessment,

i. In case of acceptance, FME shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
ii. In case of non-acceptance, FME shall inform the complainant within 5 working days along with reasons.

(d) FME shall examine and process the complaint in a fair, transparent, professional and impartial manner.

(e) FME shall ensure that the CRO has sufficient authority to resolve the complaint or has access to other officials with the necessary authority to be able to handle the complaint in a fair and impartial manner:

Where the CRO is or was involved in the conduct of the financial transaction which is the subject matter of the complaint, the complaint shall be handled by another officer designated by the FME, in a fair and impartial manner.

(f) FME may ask for additional information from the complainant while processing the complaint.

(g) FME shall dispose of complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint. The FME may either resolve the complaint or reject the complaint.

(h) In case of rejection of a complaint, the FME shall give reasons for rejection of the complaint, in writing.

6. Appeal Mechanism

a) If a complainant is not satisfied with the resolution provided by the FME or if the complaint has been rejected by the FME, the complainant may file an appeal before the CRAO of the FME, preferably within 21 days from the receipt of the decision from the CRO.

b) The CRAO shall dispose of the Appeal within a period of 30 days.

c) The CRAO shall monitor pending or unresolved complaints and review them at regular intervals for ongoing improvement in service levels.

7. Compliant before Authority

a) Where a complainant is not satisfied with the decision of the FME and has exhausted the appellate mechanism of the FME, he may file a complaint before the Authority through email to grievance-redressal@ifsca.gov.in preferably within 21 days from the receipt of the decision from the entity.

8. Maintenance of records

a) The FME shall maintain all records relating to handling of complaints, including the following:

i. Complaints received and processed;
ii. All correspondence exchanged between the entity and the complainants;
iii. All information and documents examined and relied upon by the FME while processing of the complaints;
iv. Outcome of the complaints;
v. Reasons for rejection of complaints, if any;
vi. Timelines for processing of complaints; and
vii. Data of all complaints handled by it.

b) The FME shall maintain records in electronic retrieval form for a period of 8 years. in case of any pending litigation or legal proceeding relating to the complaint, the record shall be maintained for the applicable period, after final disposal of the proceeding.

9. Reporting

a) The FME shall file reports on the handling of complaints in the form and manner specified by the Authority from time to time.

b) The FME shall have a section with heading "Complaint Handling and Grievance Redressal" in its Annual Report which is required to be filed in IFSC under the applicable laws. The section shall also provide data of all complaints received, resolved, rejected and pending during the year in a tabular/ graphical format.

c) In case a FME is not required to file an annual report for its business activities in the IFSC, it shall display the information on complaint handling on its website or on a dedicated webpage of its Group Entity, as applicable, under the heading "Complaint Handling and Grievance Redressal", on an annual basis.

10. Role of Compliance Officer

The compliance officer of FME shall ensure that handling and disposal of complaints by the FME are in accordance with the regulatory requirements specified by the Authority.

11. Review of policy

The Board shall review the Grievance Redressal Policy of the Company at least once in a year or at such reasonable intervals as may be required, in light of any material changes in regulatory framework or for business or operational reasons.

12. Conflict

In the event of any conflict between this policy and the applicable laws, the applicable laws shall prevail.

13. Amendment(s)

a) This Policy may be amended, modified or supplemented from time to time to ensure compliance with any modification, amendment or supplementation to the Act or changes as may be otherwise prescribed by the Board, from time to time.

b) Any subsequent amendment/modification in the Act and/or other applicable laws in this regard shall automatically apply to this Policy.

LINES OF DEFENSE:

Policy Owner:

Designation	Remarks
Compliance Officer	-

Document Review & Approval:

Committee review	Date	Board review	Date
RMC-UAPL	April 28, 2025	Board-UAPL	April 28, 2025
RMC-UAPL	January 13, 2026	Board-UAPL	January 19, 2026

Monitoring & Reporting Responsibilities (Lines of defense):

Lines of Defense	Role	Responsibility
First Line	Compliance Officer	Adherence to the mandatory requirements of the policy.
Second Line	Principal Officer	To monitor the effectiveness and review the implementation of this policy.
Third Line	Internal Audit	To audit the implementation of the policy.