JULY VENTURES

Investor Grievance Redressal Process

Introduction

The objective and purpose of JVF is to carry on the activity of running and managing AIFs and for this purpose to arrange, make, manage and dispose of investments with the view to providing returns to the investors in accordance with Scheme Documents, Trust Documents and applicable Laws.

Effective Date

This policy will be effective from the date of First Closing of each scheme as defined in respective Scheme Documents and communication to SEBI.

As per SEBI's circular no. CIR/OIAE/1/2014 dated December 18,2014, investor grievance redress mechanism has to be followed by all AIFs.

Purpose

Investor service is a vital element for sustained business growth, and it will be JVF's aim to ensure that its investors receive exemplary service across different touch points of the fund cycle. Prompt and efficient service is essential to retaining existing relationships and therefore investor satisfaction becomes critical. Investor queries and complaints constitute an important voice of Investor, and this policy details grievance handling through a structured grievance redressal framework. Grievance redressal is supported by a review mechanism, to minimise the recurrence of similar issues in future.

This policy sets out the grievance redressal policy (Policy) that will be followed by the Investment Manager in the event of an investor/s grievance/s. Grievances include allegations such as failure to disclose conflicts of interest, misrepresentations, etc. and complaints regarding processing of drawdown transactions, distribution of units etc. Investor feedbacks, queries/ clarifications will not be considered as instances of complaint or grievance.

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Obligations, Roles and Responsibilities of the Investment Manager

- The IM shall appoint a "**Compliance Officer**" who shall be responsible for the implementation and supervision of this policy.
- The Investor Relation Officer shall assist and report to the Compliance Officer on a daily basis in respect of Investor Grievance received and redressed.
- The Compliance Officer shall take all the necessary steps to monitor, document, analyse and report the findings to the IM and respective regulatory bodies as required by the SEBI (AIF) Regulations, other Scheme Documents and this Policy document.
- The Compliance Officer shall exercise his/her judgement in consultation with the IM and take adequate precautions to ensure implementation of an effective monitoring mechanism.

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- The Internal Auditor and the PPM Auditor of the Fund shall review the implementation, documentation and effectiveness and review the actions taken during the period of audit and shall record the observations with respect to the same in their reports.
- The IM shall peruse, review and provide necessary guidance with regard to the Investor Redressal Grievance Policy, periodically, for strengthening the process.

Principles of the Redressal Policy

- Investors shall be treated fairly at all the times.
- Complaints raised by the investors shall be dealt with courtesy and in timely manner.
- Investors shall be informed of avenues to raise their queries and complaints within the organization, and their rights if they are not satisfied with the resolution of their complaints.
- Queries and complaints shall be treated efficiently and fairly.
- The employees of the IM shall work in good faith and without prejudice, towards the interests of the Investors.

The IM has a dedicated **Grievance Redressal Team** under overall supervision of the Compliance Officer who is responsible for timely and prompt communication with the investors, while having an open attitude towards service recovery, and providing alternate solutions to investors, thus ensuring healthy relationships with our investors.

Awareness of Grievance Redressal Mechanism

- **Transparency**: The "Investor" to be provided within formation regarding the channels to convey and resolve their issues. In addition, if the resolution is expected to take longer time, same should be communicated to the Investor.
- **Accessibility**: The IM will enable the Investors to communicate their complaints/ issues and avail redressal services through multiple channels.
- **Escalation**: Information on the process of escalation of complaints to higher level, in case the Investor is not satisfied with the resolution provided by the current person handling the same.

Investor Grievance Redressal Mechanism

- Investors can lodge a complaint for non-receipt of any right available to them or failure of the IM to comply with any statutory obligation as per the scheme documents by giving details of their name, Client ID, nature and full particulars of their complaint directly to the **Investor Relation Officer**.
- The Investor Relation Officer who is receiving the query/complaint is responsible for the resolution of query/ complaint. The Investor Relation Officer at the first level is responsible for ensuring that query/complaint is resolved to the satisfaction of the client, however if the client remains unsatisfied then he/she can escalate the issue through the grievance redressal mechanism.

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- All the queries/complaints received shall be handled and coordinated by Investor Relation Officer and shall inform the investor on the status of their query. Investors are requested to **approach the Investor Relation Officer** on any business day between 9 AM to 5 PM to provide feedback and register their queries/ complaints.
- Investors **can write to Compliance Officer** if they do not receive any response within 7 business days of writing to the Investor Grievance Officer of if/he or she is not satisfied with the response received. The Investor can expect a reply within 7 business days of approaching the Compliance Officer.
- In case the Investors are not satisfied with the response of the Compliance Officer, they can **escalate it ahead to the Investment Manager**.
- If the Investors do not receive a response within 30 business days of approaching the **Investment Manager** or if they are not satisfied with the resolution received for the Compliance Officer and the IM, they can escalate their issues to SEBI through its redressal platform SEBI Complaints Redress System (**"SCORES"**).
- In circumstances where the Investors have issue with the Investment Manager, they can **write to the Trustee** giving the details of the compliant. Within the rights of the Trustee as per the terms of the Private Placement Memorandum and other Scheme Documents, it shall resolve the grievance by taking appropriate measures. The investor can expect a reply within 10 business days of approaching the Trustee. In cases where the grievance is outside the purview of the Trustee or if the Investor is not satisfied with the resolution from the Trustee, then he/she may approach to SEBI through its redressal platform, SCORES.

Escalation & Review Matrix

1. **First Level:** Investor Relation Officer; Response Time: Within 7 days of approaching the Investor Relation Officer.
2. **Second Level:** Compliance Officer; Response Time: Within 10 business days of approaching the Compliance Officer.
3. **Third Level:** Investment Manager; Response Time: Within 30 business days of writing / approaching the First Level Officer.
4. **Fourth Level:** Trustee; Response Time: 7 Business Days;
5. **Fifth Level:** SEBI Redressal Portal; SCORES.

Contact Details

Person Responsible	Contact Details		Address
Investor Relation Officer	Name: Ravindra Krishnappa Email: ravi.k@julyventures.com +91 9844039465	Contact:	Units No. 206-207, HM Geneva House, No. 14 Cunningham Road, Bangalore 560052
Compliance Officer	Name: Hirva Iyer		Unit No. FF-50, Pragya Accelerator, GIFT City IFSC - SEZ, Gandhinagar-382355, India

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	Email: hirva.i@julyventures.com +91 9426610312	Contact:	
Investment Manager	Name: July Ventures LLP Email: investors@julyventures.com +91 6366439292	Contact:	No. 1464, 14th Main,West of Chord Road, Stage 2, Mahalakshmipuram PO Bangalore North, Karnataka, India - 560086 Contact no: +91 6366439292
Trustee	Name: Orbis Trusteeship Services Private Limited Email: mayank.narang@orbisfinancial.in +91 2240776565 / 2240776500	Contact:	4A, Ocus Technopolis, Sector 54, Golf Club Road, Gurgaon, Haryana, India – 122002
SEBI Portal	*Refer Annexure A & B Below*		

Type of Investor Query / Complaints

Particulars	Contact Personnel
New Account Opening including documentation	Investor Relation Officer
Address Change	Investor Relation Officer
Change of Bank / Change in KYC	Investor Relation Officer
Statement of Address request	Investor Relation Officer
Transfer request of unlisted units	Trustee
Closure of Accounts	Investor Relation Officer
General Enquiries	Investor Relation Officer
Non-receipt of statement of accounts / Investors report	Investor Relation Officer
Non-receipt of Annual audit report of the fund	Investor Relation Officer
Distribution of profits from Temporary Investment not received	Compliance Officer
Distribution of amount from redemption of units not received	Compliance Officer
Mistakes / Errors in the Statement of Accounts	Investor Relation Officer
Fraud Related Issues	SCORES

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Conflict of Interest related issues	IM
Violation of any terms of the Private Placement Memorandum and other schemes documents	Trustee / SCORES
Gross Negligence and Misconduct by the IM	Trustee / SCORES
Majority Investor consent not obtained wherever required as per the SEBI (AIF) regulations and the terms of the PPM	Trustee / SCORES
Non receipt of unutilized drawdowns within the stipulated time as per the PPM	Compliance Officer.
Legal Officer	Compliance Officer.
Breach of any Statutory Compliance by the IM not covered elsewhere in the matrix	Trustee / SCORES

Record Maintenance

Investor Relation Officer of the Grievance Redressal Team shall be responsible for the record maintenance of such activities, under the supervision of the Compliance Officer.

The Compliance Officer shall be assisted by the Investor Relation Officer and shall have the discretion to take assistance/help of any professionals and/or software for better monitoring and implementation of Investor Grievance Redressal Policy, with prior approval of the IM, without diluting the accountability and responsibility of the Compliance Officer.

Redressal Platform by SEBI

- SEBI Complaints Redress System (SCORES) platform is a web based centralized system to capture investor complaints against listed companies and registered intermediaries and is available 24X7.
- SEBI encourages investors to lodge complaints through electronic mode in SCORES. However, complaints received from investors in physical form are also digitized by SEBI and uploaded in SCORES. Thereafter, follow-up actions of the complaint are done in electronic form only i.e. through SCORES. Investors can easily access, retrieve and preserve the complaints lodged by them in electronic mode. Further, it enhances the turnaround time and speed of redressal of a complaint.
- Investors may contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on SCORES. The lists of Investor Associations are available on SEBI website (www.sebi.gov.in). Investors may also seek assistance in filing complaints on SCORES from **SEBIs toll free helpline number 1800 266 7575 or 1800227575.**
- To enhance investor satisfaction on complaint redressal, SEBI has already put in place a ‘Complaint Review facility’ under SCORES wherein an investor if unsatisfied with the redressal may within 15 days from the date of closure of his complaint in SCORES opt for review of the complaint and the complaint shall be escalated.

Procedure for filing and redressal of Investor grievances using SCORES

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- Investors who wish to lodge a complaint on SCORES are requested to register themselves on www.scores.gov.in by clicking on "*Register here*". While filing the registration form, details like Name of the investor, PAN, Contact details, Email id, Aadhaar card number (optional), CKYC ID (optional) etc. (Annexure A) may be provided for effective communication and speedy redressal of the grievances. Upon successful registration, a unique user id and a password shall be communicated to the investor through an acknowledgement email/SMS.
- An investor shall use login credentials for lodging complaints on SCORES ("*Login for registered user" section)*. Details on how to lodge a complaint on SCORES is at Annexure B.
- The complainant may use SCORES to submit the grievance directly to companies / intermediaries and the complaint shall be forwarded to the entity for resolution. The entity is required to redress the grievance within 30 days, failing which the complaint shall be registered in SCORES.

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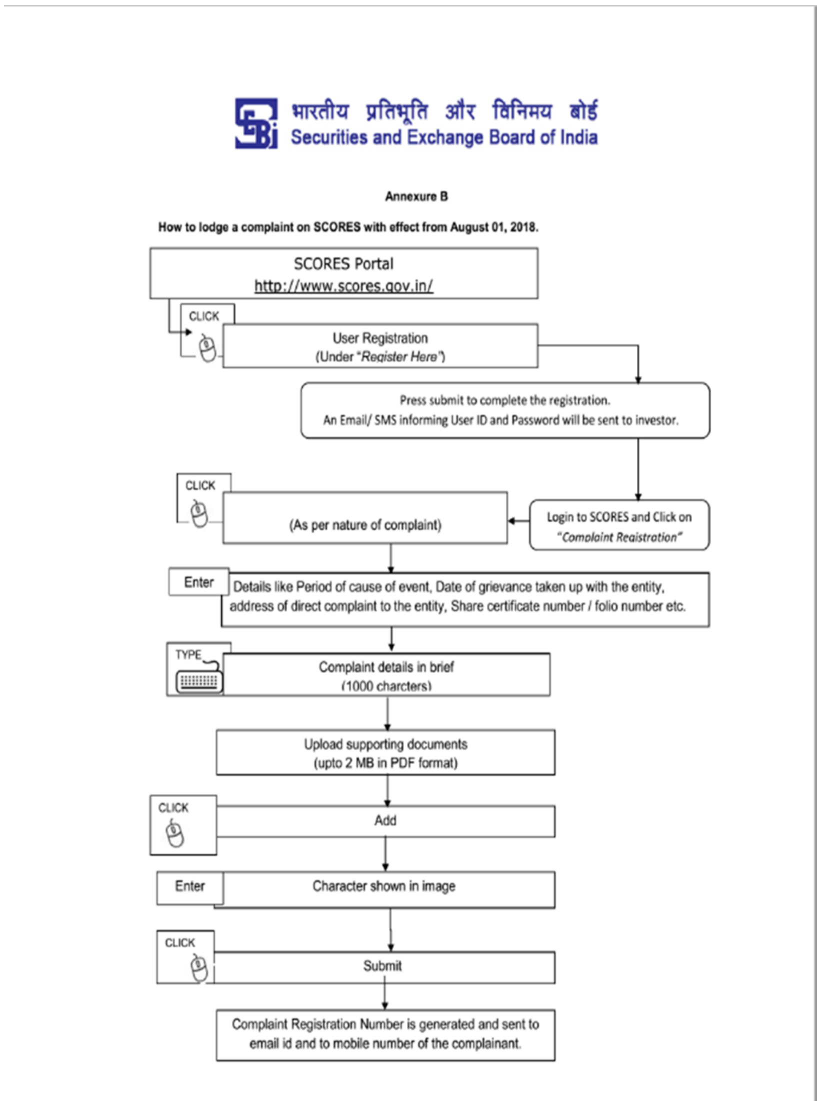
Annexure A

Details to be provided while registering on SCORES

1. Name of the complainant*
2. Pan Number*
3. Aadhaar Number (Optional)
4. CKYC ID (Optional)
5. DP Id & Client Id
6. Postal address for communication*
7. Contact number – Mobile* Landline
8. Email id* – For receipt of acknowledgement letter / updates of complaints on SCORES.
9. Bank account details – To facilitate direct credit of benefits to investor.
10. Client id as given by Broker / Stock Exchange.

Annexure B



Miscellaneous

The Investment Manager is authorised to amend the Policy from time to time to give effect to any changes/amendments notified by the SEBI or any other governing regulatory authority.

The amended Policy shall be placed before LP advisory committee for noting and ratification.

This policy shall be effective from now on and can be modified, withdrawn or suspended by the IM at its sole discretion without prior intimation.