

# ABANS FINANCIAL SERVICES LIMITED IFSC BRANCH

# **GRIEVANCE REDRESSAL POLICY**

**Version I** 

Version	Adoption/Amended	Authority	Date
I	Adoption	Internal Committee	15 <sup>th</sup> July, 2025
II	Amended	Internal Committee	4 <sup>th</sup> December,2025



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#### I. PREFACE

**Abans Financial Services Limited** formerly known as 'Abans Holding Limited (IFSC Branch)', a company incorporated under the provisions of the Companies Act, 1956, acting through its branch office set-up in the Gujarat International Finance Tec-City ("GIFT City") located at Unit No. 1108 A, Signature Building, 11th Floor, Block 13B, Zone – 1, GIFT SEZ, Gandhinagar – 382355, Gujarat, India, registered with the International Financial Services Centres Authority ("IFSCA") is set up as a Registered Fund Management Entity (Non-Retail) ("FME").

The FME is currently providing fund management services to **Abans Short Term Opportunities Investment Trust IFSC ("Fund")**, a Restricted Scheme (Non-Retail) classified as a Category III Alternative Investment Fund under the IFSCA (Fund Management) Regulations, 2025 ("Regulations") bearing registration number IFSC/AIF3/2023-24/0112.

#### II. OBJECTIVE OF THE POLICY

This grievance redressal policy captures the internal mechanism adopted by the FME to handle complaints and promptly redress investor grievances in line with the Regulations. The matters as specified in Annexure C shall not constitute complaints or grievances, for the purpose of this policy. In addition to Annexure C any queries relating to products / services / details relating to products and/or services shall also not be considered as complaints / grievance.

#### III. APPLICABILITY

The Policy applies to the investors of the FME, its employees, appointed representatives, and relevant persons without exception, with respect to the fund management and other ancillary services provided by the FME in line with the Regulations.

#### IV. GRIEVANCE REDRESSAL MECHANISM

The Compliance Officer of the FME as appointed under the Regulations shall act as the designated Complaint Redressal Officer ("CRO") to whom all the complaints can be addressed and such CRO identified, shall have the necessary authority and power to handle complaints and grievances submitted by investors/clients. Further, the CRO in his role as the Compliance Officer shall also ensure that all complaints and grievances handled by the FME are in accordance with the provisions specified under the Regulations and/or as may be specifically prescribed by IFSCA in this regard. The CRO



may designate and constitute a concerned team for receiving the grievances, however at all times the CRO shall continue to be responsible for ensuring compliance under this policy and under the Regulations towards the investor grievance.

Complaints/grievances may be received in the following manner: -

a) the concerned team will then be required to forward the concerns of the client directly to the CRO at *investorsgrievance.fmeifsc@abansfinserv.com* for necessary assessment along with their inputs, if any. Alternatively, the client may also choose to directly reach out to the CRO at the email address specified below, for complaint resolution/grievance redressal.

Pursuant to assessment, -

- In case of acceptance, the CRO shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint;
- In case of non-acceptance, the CRO shall inform the complainant of the non-acceptance within 5 working days along with reasons for not accepting the same.

#### V. TIMELINES FOR RESOLUTION

The CRO shall examine and process the complaint in a fair, transparent, professional and impartial manner.

Provided that, 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.

The CRO may ask for additional information from the complainant while processing the complaint.

Upon acceptance of the complaint, the CRO shall endeavour to dispose of the complaint within a reasonable timeframe preferably within 15 days from the date of acceptance of complaint but not later than 30 days from the date of acceptance of complaint. The CRO may either resolve the complaint or reject it, depending on the nature of the issues involved, evidence provided by the complainant and the grievance redressal policy.

In case of rejection of a complaint, the CRO shall give reasons for rejection of the complaint, in writing.

#### VI.APPEAL MECHANISM

If the complainant is not satisfied with the resolution provided by the CRO or if the complaint has been rejected, the complainant may file an appeal before the Complaint Redressal Appellate Officer of the FME preferably within 21 days from the receipt of the decision from the CRO. For the purpose of this policy, the Principal Officer of the FME as appointed under the Regulations shall act as the designated Complaint Redressal



Appellate Officer ("CRAO") to whom all the complaints can be escalated.

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

#### VII. COMPLAINT BEFORE IFSCA

Where a complainant is not satisfied with the decision of the FME (including CRO and CRAO) and has exhausted the appellate mechanism of the FME, the complainant may choose to file a complaint before the IFSCA through email to grievance-redressal@ifsca.gov in preferably within 21 days from the receipt of the decision from the FME or such other timeline as may be specified by IFSCA in this regard.

#### VIII. RECORD KEEPING & RECORD MAINTENANCE

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

- Complaints received and processed;
- All correspondence exchanged between the FME and the complainant;
- All information and documents examined and relied upon by the FME while processing of the complaints;
- Outcome of the complaints;
- Reasons for rejection of complaints, if any;
- Timelines for processing of complaints; and
- Data of all complaints handled by it.

The FME shall maintain records in electronic retrieval form for at least 8 (eight) years from the date of disposal of complaint. Provided further that 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 proceedings.

#### IX.AMENDMENT

This policy will be reviewed annually and updated as necessary to ensure continued compliance with legal and regulatory requirements. The review process will involve assessing the effectiveness of the grievance redressal mechanism, identifying areas for improvement, and making necessary changes to enhance the overall service quality and operational efficiency.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant statutory, governmental and regulatory authorities are not consistent with the provisions laid down under this policy, then such amendment(s), clarification(s), circular(s) etc. shall



	* ABANS
prevail upon the provisions hereunder.	
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# **Annexure A - Grievance Form Template**

Sr.No	Particular	Details
1.	Name of Aggrieved Client	
2.	Folio Number	
3.	Name of the Fund	
4.	Mobile Number	
5.	Address	
6.	Country	
7.	Share Class subscribed for	
8.	Details of Grievance	

Date:		
Name of Client:		
Signature of Client :		



### **Annexure B- Contact Information**

# <u>For Abans Financial Services Limited IFSC Branch</u> (formerly known as Abans Holdings Limited)

Office: <u>Unit No. 1108-A Signature Building, Eleventh Floor, Block 13B Zone-1 GIFT SEZ, Gandhinagar, 382355, Gujarat, India</u>

Email id for sending all queries & complaints: investorsgrievance.fmeifsc@abansfinserv.com

Escalation Matrix for Customer Complaints/ Grievances			
Levels	Details	Contact Person	Email ID
1st Level	Complaint Redressal Officer	Mr.Partha Sen	partha.sen@abansfinserv.com
2 <sup>nd</sup> Level	Complaint Redressal Appellate Officer	Mr. Anubhav Goyal	anubhav.goyal@abansfinserv.com
3 <sup>rd</sup> Level	IFSCA (International Financial Services Centres Authority)		grievance-redressal@ifsca.gov.in



#### Annexure C – Matters not constituting complaints/grievances

- 1. Anonymous complaints (except whistleblower complaints);
- 2. Incomplete or unspecific complaints;
- 3. Allegations without supporting documents;
- 4. Suggestions or seeking guidance/explanation;
- 5. Complaints on matters not relating to the financial products or services provided by the FME;
- 6. Complaints about any unregistered/unregulated activity; and
- 7. References in the nature of seeking information or clarifications about financial products or services.