

GRIEVANCE REDRESSAL POLICY

FOR

NUOM STRESSED ASSETS OPPORTUNITIES FUND
(Alternative Investment Fund – CAT II)

BY

NUOM SERVICES LLP
INVESTMENT MANAGER TO THE FUND

Policy Version Details	Date of Implementation
Grievance Redressal Policy V1	15.07.2024

GRIEVANCE REDRESSAL POLICY

1. INTRODUCTION

- 1.1 NuOm Stressed Assets Opportunities Fund (“**Fund**”) is a scheme of NuOm Alternative Investment Trust (“**Trust**”). The Trust has been constituted as a trust under the Indian Trust Act, 1882 and is registered with Securities and Exchange Board of India (“**SEBI**”) as Category II Alternative Investment Fund (“**AIF**”). The Trust and its schemes will be managed and sponsored by the NuOm Services LLP (“**Investment Manager**”/“**Sponsor**”).
- 1.2 The Fund is a close- ended fund and the first scheme of the Trust. In this Grievance Redressal Policy (“**Policy**”), words and expressions shall, unless expressly defined herein, have the meaning ascribed to them in the PPM of the Fund

2. INVESTMENT OBJECTIVE

The investment objective of the Fund The object and purpose of the Scheme is –

- 2.1 To raise resources from the contributors to make investment in equity shares and debt securities issued by Portfolio Companies (engaged in purchasing and selling real estate properties and plant & machinery). The Scheme may also invest in security receipts.
- 2.2 The Fund may also invest in securities of entities listed on the Indian stock exchange. Such investments would be sector-agnostic. The investment in listed securities will be, at all times, be not more than 49% of the Investable Funds of the Fund. The Fund may also make investment as a Qualified Institutional Buyer, as defined under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.
- 2.3 Without prejudice to the foregoing, the object and the purpose of the Scheme includes the following:
 - (a) to carry on the activities of the Scheme primarily in the form of a Category II Alternative Investment Fund in accordance with the provisions of this Trust Deed and the AIF Regulations;
 - (b) to raise capital from the Contributors / new investors under Scheme for the purpose of making Investments in accordance with the provisions contained in Trust Deed and this Private Placement Memorandum;
 - (c) to invest in equity shares or debt securities issued by any Portfolio Company; and
 - (d) to do all other things necessary and conducive to the attainment of the objects of the Scheme.

3. PURPOSE

- 3.1 Investor service is crucial for sustained business growth, and we aim to provide exemplary service to our investors at every stage of the fund cycle. Prompt and

efficient responses to any investor requests, queries, grievances, or complaints are essential for maintaining strong relationships, making investor satisfaction a top priority. Investor queries and complaints provide valuable feedback, and this policy outlines a structured grievance redressal framework to address such issues. The grievance process is supported by a review mechanism designed to prevent similar problems from occurring in the future.

- 3.2 This policy describes the procedure the Investment Manager will follow in case of an investor grievance. Grievances may include issues like failure to disclose conflicts of interest, misrepresentations, and complaints about drawdown transactions or the distribution of units. However, general feedback or requests for clarification will not be classified as complaints or grievances.

4. REGULATORY BACKGROUND

- 4.1 SEBI Master Circular No. SEBI/HO/AFD-1/AFD-1-PoD/P/CIR/2024/39 dated May 7, 2024 for Alternative Investment Funds (AIFs)
- 4.2 SEBI Master Circular No. SEBI/HO/OIAE/OIAE_IAD-3/P/CIR/2023/195 dated December 28, 2023 for Online Resolution of Disputes in the Indian Securities Market.
- 4.3 SEBI Circular No. SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023 on Redressal of investor grievances through the SEBI Complaint Redressal (SCORES) Platform and linking it to Online Dispute Resolution platform.
- 4.4 Securities and Exchange Board of India (Alternative Investment Funds) Regulations, 2012

5. EFFECTIVE DATE

This Policy shall be effective from 15th July, 2024

6. OBLIGATIONS OF THE INVESTMENT MANAGER

- 6.1 The Investment Manager aims to resolve investor grievances promptly and effectively within 30 calendar days of the grievance being raised. It also strives to prevent similar issues from arising in the future.
- 6.2 As per SEBI Master Circular No. SEBI/HO/AFD-1/AFD-1-PoD/P/CIR/2024/39 dated May 7, 2024, the AIF, through the Investment Manager, is required to disclose investor complaints and their redressal status in a dedicated chapter of the PPM for each scheme. The AIF must maintain records of investor complaints in the format specified in Annexure-1, and this data must be compiled within 7 days of the end of each quarter.
- 6.3 The Investment Manager will allocate sufficient resources to ensure that grievances and queries are addressed in a timely manner. The grievance redressal process will focus on achieving the following outcomes:

- 6.3.1 Investors are treated fairly, reasonably, and with justice at all times;
- 6.3.2 Investor complaints and grievances are handled courteously, with every effort made to resolve them promptly;
- 6.3.3 Investor confidentiality and privacy are always protected; and
- 6.3.4 Investors are kept informed periodically about the status and actions taken.

6.4 The Investment Manager will notify investors of the available options for resolving grievances:

- 6.4.1 Registering a complaint on the SEBI Complaints Redress System (SCORES) via:
 - A. The Investment Manager through email or letter; or
 - B. SEBI via the SCORES website; and
 - C. Online Dispute Resolution and other available remedies.

7. GRIEVANCE REDRESSAL MECHANISM

Investor queries and complaints often arise from a lack of understanding or perceived deficiencies in service. These deficiencies can include insufficient explanations, a lack of clarifications, or misunderstandings that lead to unmet expectations. Service shortfalls may result from inadequate facilities or poor staff attitudes when dealing with investors, ultimately affecting the expected delivery standards. Investors can seek clarifications to their query and are further entitled to make a complaint in writing, orally or telephonically. Investors are requested to

- approach only the Fund/ Investment Manager directly, and in the normal course can expect a response within 7 business days of the query or complaint registration.
- Investors can call the Fund/ Investment Manager Team at +91 98904 26336 on any business day between 9 am and 6 pm to provide feedback or to register their queries or complaints.
- Investors can send an email to nuomserv@gmail.com
- Investors can write to the Fund/ Investment Manager with their query/ complaint at the registered office address as mentioned here:

***NuOm Services LLP
Plot No 47, Shri Balaji, Hindusthan Colony,
Wardha Road, Nagpur – 440 015***

- Alternatively, if the investors do not receive a response within 7 business days of writing to the Investment Manager Team or if the investor is not satisfied with the response received as per above measures, the investors can escalate the matter to the Partners of the Investment Manager and reach them at

vervecapital@gmail.com or swap121978@gmail.com or via post at:

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Wardha Road, Nagpur – 440 015

The investor can expect a reply within 7 business days of approaching the Designated Partners of the Investment Manager.

Lastly, the investors may register their complaint on the SCORES website (www.scores.gov.in):

- The investors will have an alternate option to register their complaints directly to SEBI on the SCORES website. The Investment Manager has to obtain the SCORES user ID and password by registering for the same. The SCORES ID of the Fund is AIF01376
- Upon receiving complaints through the SCORES platform, the Investment Manager shall ensure its resolution within 30 calendar days of submission of such complaint. During such period, the investor will be kept duly informed of the status and actions taken.
- Investors may also send their complaints to: Office of Investor Assistance and Education, Securities and Exchange Board of India, SEBI Bhavan. Plot No. C4-A, 'G' Block, Bandra- Kurla Complex, Bandra (E), Mumbai – 400051

	Complaint handling related services	Timeline for completion of activity
a.	Response to complaint received from investors	Within 30 days from the date of receipt of complaint
b.	Redressal of investor complaint received from SEBI/ SCORES	Within 30 days from the date of receipt of complaint

8. TURN AROUND TIME

Unless explicitly specified hereinabove or under Applicable Law, the Fund/ Investment Manager is expected to respond to queries and complaints of the investors within a reasonable period of time.

9. ESCALATION MECHANISM

- 9.1 The Fund/Investment Manager shall make every effort to provide interim responses to inform investors about the status of their complaints and, if necessary, request additional time for resolution.
- 9.2 A designated member of the Fund or the Investment Manager Team shall oversee the internal grievance redressal system ("Grievance Head"). The Grievance Head will monitor pending or unresolved complaints, conducting regular reviews to improve service

standards. The Grievance Head must ensure that all queries and complaints are resolved within 30 business days, under any circumstance.

- 9.3 The Investment Manager Team shall maintain periodic reports detailing the number of complaints received, their nature, resolutions, and any unresolved or escalated complaints. All documentation related to investor grievances and their resolutions, including escalated matters, will be retained for record-keeping purposes.

10. RESOLUTION OF COMPLAINTS BY THE COMPLIANCE OFFICER

The Compliance Officer must resolve complaints and upload the Action Taken Report (ATR) on SCORES within 21 calendar days of receiving the complaint. Complaints received through other channels must also be resolved within 21 calendar days, with appropriate communication sent to the investor. Relevant documents pertaining to the complaint resolution should be uploaded on SCORES or sent to the client.

First Review of the Complaint:

The complainant can request a review of the resolution within 15 calendar days from the date of the ATR. The Designated Body will handle this review if the investor requests it or if the Investment Manager fails to submit the ATR within the stipulated 21 calendar days from the complaint's receipt through SCORES. The Investment Manager is required to submit the ATR to the Designated Body within the timeframe specified by the Designated Body. Following the review, the Designated Body will provide a revised ATR to the investor on SCORES within 10 calendar days.

Second Review of the Complaint:

The investor can request a second review within 15 calendar days of the Designated Body's ATR submission. If the investor is unsatisfied with the ATR or the Designated Body fails to submit the ATR within 10 calendar days, SEBI may take cognizance of the complaint for a second review through SCORES.

In this case, SEBI may engage with relevant stakeholders, including the concerned entity and the Designated Body. The Investment Manager is required to act promptly upon receiving the second review complaint from SEBI and submit a revised ATR to SEBI via SCORES within the timeframe specified by SEBI. A complaint is considered resolved, disposed, or closed only when SEBI marks it as such in SCORES.

11. ODR AND OTHER REMEDIES

If investors raise issues that involve adjudication of third-party rights, legal or factual questions, or disputes (*lis*) between parties, or if they are dissatisfied with the resolution on SCORES after SEBI's review, they can seek remedies through the **Online Dispute Resolution (ODR)** platform at <https://smartodr.in>. Additionally, investors have the option to pursue legal action through civil courts, consumer courts, and other legal forums.

Investors may choose to use the ODR mechanism or other civil remedies at any time.

If they opt for the ODR mechanism or civil remedies while their complaint is still pending on SCORES, the complaint will be considered resolved on the SCORES platform.

12. DISCLOSURE

Investment Managers are required to inform their clients about the SEBI-prescribed Investor Charter by prominently displaying it on their website, Private Placement Memorandum (PPM), mobile apps, and other platforms, outlining the investor grievance redressal mechanism.

Data on investor complaints received against the Alternative Investment Fund (AIF) and its individual schemes, along with their resolution status, must be disclosed by all AIFs in a prescribed format as a separate chapter in the PPM.

For effective monitoring, AIFs are also required to maintain records of investor complaints in the prescribed format, with data compiled no later than 7 days after the end of each quarter.

13. RESPONSIBILITY

The Compliance Officer of Registered Intermediary will be responsible for implementation of the Policy.

14. VIOLATION

If anyone is found in violation of this Policy, he/she will be liable for appropriate action by appropriate authority.

15. REVIEW OF POLICY

The Grievance Redressal Policy will be reviewed as and when warranted due to the changes in the regulatory framework, business or operational reasons and best practices as may be deemed appropriate.
