

**Millingtonia Capital Advisors LLP****Investor Grievance Redressal Policy****Private & Confidential**

This process note is the property of Millingtonia Capital Advisors LLP. Millingtonia Capital reserves the right to update this policy as needed to comply with regulatory changes or improve our grievance redressal process. Any updates will be communicated to investors through our website or other appropriate channels.

**VERSION CONTROL**

Sr. No.	Version No.	Date	Changes Incorporated	Prepared By	Reviewed By	Approved By
1	1.0	25.03.2025	Creation of the Policy document	Mahendrasingh Dahiya	Raghav Sanwal	Governance Committee

**Policy is Effective from: 01<sup>st</sup> April, 2025**

## INTRODUCTION

Millingtonia Capital Advisors LLP (the "Adviser"), a limited liability partnership incorporated in India under the provisions of the Limited Liability Partnership Act, 2008 acts as the investment manager to Millingtonia Capital India Opportunity Fund ("Fund"), a scheme of Millingtonia Capital AIF ("Trust").

Millingtonia Capital AIF is registered with International Financial Services Centres Authority ("IFSCA") as a Category III Alternative Investment Fund and Millingtonia Capital India Opportunity Fund is registered with SEBI (through a DDP) as Category I Foreign Portfolio Investor.

Under IFSCA best practices, investment advisors are required to establish a policy on grievance redressals that will apply to all investors. Millingtonia Capital is committed to maintaining a transparent, fair, and efficient process for addressing grievances raised by our valued investors. We strive to ensure that all concerns are handled promptly, professionally, and in accordance with applicable laws and regulations.

### 1. OBJECTIVE

"**Millingtonia Capital Advisors LLP**" believes that quick and effective handling of complaints as well as prompt corrective/preventive actions and processes are essential for providing our services. This policy document puts in place an effective and suitable mechanism for receiving and addressing complaints from investors with specific emphasis on resolving such complaints fairly and expeditiously. Providing excellent service on a regular and consistent basis is very important for the organization's sustained growth.

Objective of this policy document is to ensure that:

- Issues raised by investors are dealt with courtesy and are resolved on time.
- The Company will treat all the complaints efficiently and fairly without any bias.

#### Definitions:

- **Investors:** The term "Clients/Investors" shall refer to and include all the clients or investors concerning the services or activities of "**Millingtonia Capital Advisors LLP**". For convenience, the term "Clients/Investors" also encompasses clients of the product(s) or scheme(s) that have been or will be launched by "**Millingtonia Capital Advisors LLP**".
- **Complaint or grievance:** is "An expression of dissatisfaction made by the Investor related to the services of **Millingtonia Capital Advisors LLP/Scheme(s)**". This however needs to be differentiated from matters like from general feedback, enquiry before the due date.
- **Complainant:** Clients/Investors lodging the complaint.
- **Redressal:** Actions taken to resolve the complaint and provide relief to the complainant.

## 2. GUIDING PRINCIPLES

1. **Transparency:** All “investors” in the fund will be provided with information 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.
2. **Accessibility:** The Company will enable the Investors to communicate their complaints/issues and avail redressal services through multiple channels.
3. **Escalation:** This includes a process that escalates complaints to a higher level in case the Investor is not satisfied with the resolution or faces issues with working with the current person handling the complaint.
4. **Compliance:** Adhering to regulatory requirements and industry standard.

## 3. GRIEVANCE REDRESSAL POLICY

### Submission of Grievance:

Investors may submit their grievances through the following channels below. Complaints should include the investor's name, contact details, investment details, and a clear description of the grievance.

- **E-Mail:** For the purpose of making a complaint, all the aggrieved clients/investors shall formally write an e-mail from their registered e-mail to [grievance@millingtonia.com](mailto:grievance@millingtonia.com).
- **Mail:** Unit No. 404 – B, 4th Floor, Pragya Tower, Block 15A, Zone 1, GIFT SEZ Road 1C, GIFT CITY, Gandhinagar – 382355

### Registration of Complaints

- **Millingtonia Capital Advisors LLP** has established a systematic structure that ensures fair and just resolution within the guidelines and policies governing the company's activities. These guidelines also follow the International Financial Services Centers Authority's (IFSCA) guidance on grievance redressal and complaint handling.
- The CRO and if required other members of the team will investigate the grievance thoroughly, consulting relevant departments and records. Investors will receive regular updates on the status of their grievance, if applicable

For the purpose of Complaint Handling and Grievance Redressal and in accordance with the guidelines issued by IFSCA, **Millingtonia Capital Advisors LLP** has appointed the following persons as Complaint Redressal Officer (CRO) and Complaint Redressal Appellate Officer (CRAO):

Designation	Name	Email ID
Complaint Redressal Officer (CRO)	Mahendrasingh Dahiya	<a href="mailto:grievance@millingtonia.com">grievance@millingtonia.com</a>
Complaint Redressal Appellate Officer (CRAO)	Madhav Sanwal	<a href="mailto:compliance@millingtonia.com">compliance@millingtonia.com</a>

### **Acknowledgment of Complaints**

- The CRO will evaluate a complaint's merits after receiving it. All complaints will be recorded and logged (see Maintenance of Records section below).
- Within three working days of receiving the complaint, the CRO must provide written confirmation of acceptance.
- If the CRO has any questions or requires further information to evaluate the complaint, the CRO must notify the complainant in writing within five working days.
- Following acceptance, the complaint will be examined fairly and impartially by another officer appointed by **Millingtonia Capital Advisors LLP** if the CRO is or was involved in the financial transaction that is the subject of the complaint.

### **Redressal Mechanism**

- Primary responsibility is with the CRO to resolve the complaint within 30 working days of acceptance of the complaint.
- CRO is to ensure that suitable resolutions are provided and remedial measures are carried out. As the complaint is being processed, the CRO may request more information from the complainant.
- **Escalation or Appeal:** A complainant may file an appeal with the CRAO, preferable within 21 working days of receiving the CRO's judgment, if they are dissatisfied with the resolution they received or if the CRO has rejected their complaint. The CRAO, on receipt of the complaint, shall dispose of the Appeal within a period of 30 working days.
- **Complaint to IFSCA:** Where a complainant is not satisfied with the decision of **Millingtonia Capital Advisors LLP** and has exhausted the appellate mechanism, the Complainant may file a complaint before the Authority through email to [grievance-redressal@ifsc.gov.in](mailto:grievance-redressal@ifsc.gov.in) preferably within 21 working days from the receipt of the decision.
- **Closure of Complaints:** When the complainant expresses satisfaction with the resolution or no additional response is obtained within 30 working days of the suggested settlement, the complaint is deemed closed. Clients and investors will receive written communication for closure of grievances.

## **4. MAINTENANCE OF RECORDS**

- A grievances register shall be maintained by the Compliance Officer at the registered office. All complaints received shall be entered into the complaints register. The Complaint register shall contain the details of:
  1. Complaints received and processed
  2. Timelines for processing/resolving complaints
  3. Outcome of the complaints
  4. Details of action taken, date of closure and time taken for solving each complaint
  5. Reasons for rejection of complaints, if any.

- **Millingtonia Capital Advisors LLP** shall also maintain the following records for at least six years from the date of disposal of the complaint. In case of any pending litigation or legal proceeding relating to the complaint, the following records shall be maintained for six years, after the final disposal of the proceeding:
  1. All correspondence exchanged between the Entity/Fund and the complainants
  2. All information and documents examined and relied upon by the Entity/Fund while processing the complaints.

## **5. GENERAL**

- The number of complaints received, solved, rejected or pending shall be reported to the IFSCA in the quarterly compliance report.
- The Compliance Officer shall ensure that the handling and disposal of complaints by CRO/CRAO are in accordance with the regulatory requirements specified by IFSCA.
- This policy will be reviewed annually by the Governance Committee to incorporate changes in regulations, industry practices, or operational requirements.
- This Policy document shall always be available on [www.millingtonia.com](http://www.millingtonia.com)