

Policy for Complaint Handling and Grievance Redressal

- Waterfield International IFSC Private Limited (hereinafter referred to as “**Waterfield**” or “**the Company**”) is registered with International Financial Services Centres Authority (“**IFSCA**”) as a Registered Fund Management Entity (Non - Retail) under the IFSCA (Fund Management) Regulations 2025 (‘IFSCA FM Regulations’) bearing Registration No: IFSCA/FME/II/2025-26/174.
- The objective of this policy is to ensure that:
 - a) To have an adequate mechanism in place for receiving, handling and redress of complaints in a fair, transparent and timely manner.
- Grievance Redressal follows the following principles:
 1. Clients are always treated fairly.
 2. Complaints raised by Clients are dealt with courtesy and in a timely manner.
 3. Complaints are treated efficiently and fairly.

DEFINITIONS:

- a) “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.
- b) “Complaint Redressal Officer” or “CRO” shall be an employee of Waterfield responsible for handling of complaints received from its consumers;
- c) “Complaint Redressal Appellate Officer” or “CRAO” shall be a senior level person of Waterfield for handling appeals of consumers against the decision taken by the Complaint Redressal Officer of the Regulated Entity

COMPLAINT HANDING PROCEDURE

- **WHAT CONSTITUTES A VALID COMPLAINT:**
 - a. Complete and specific in nature
 - b. Includes supporting documents
 - c. Relates to financial products/services provided by Waterfield in the IFSC
 - d. Appeals against decisions Client is not satisfied with
- **WHAT IS NOT A COMPLAINT:**
 - a. Anonymous complaints (except whistleblower complaints)
 - b. Incomplete, vague or unspecific complaints
 - c. Allegations without supporting evidence
 - d. General suggestions or guidance requests
 - e. Complaints about unregistered/unregulated activities
 - f. Information requests about financial products

COMPLAINT HANDLING PROCEDURE

- A designated e-mail id wfifsc@waterfieldadvisors.com has been created for the clients to lodge their complaints. This email id is communicated to the clients on the website of the Company <https://waterfieldadvisors.com/regulatory-information> ('Website').
- All the client grievances received at wfifsc@waterfieldadvisors.com shall be verified and scrutinized by the Chief Redressal Officer of the Company and the same shall be resolved within 15 days but ordinarily not later than 30 days of acceptance of complaint.
- On receipt of a complaint, CRO shall make an assessment on the merits of the complaint. Pursuant to assessment:
 - a) In case of acceptance, Waterfield shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
 - b) In case of non-acceptance/rejection, Waterfield shall inform the complainant within 5 working days along with reasons in writing.
- Waterfield shall examine and process the complaint in a fair, transparent, professional and impartial manner.
- Waterfield 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

Provided that, where the CRO is or was involved in the conduct of the financial transactions which is the subject matter of the complaint, the complaint shall be handled by another officer designated by the Regulated Entity, in a fair and impartial manner.

- Waterfield may ask for additional information from the complainant while processing the complaint.
- If the client is not satisfied with the resolution provided, the client may file an appeal with the CRAO of the Company within 21 days from the date of receipt of the decision from CRO and the complaint shall be resolved within 30 days from the date of acceptance of the complaint.
- If the client is not satisfied with the resolution provided, the client may file a complaint before the Authority through email to grievance-redressal@ifsc.gov.in preferably within 21 days from the receipt of the decision from the Company.

RECORD KEEPING:

- The Regulated Entity shall maintain all records in electronic retrieval form relating to handling of complaints for period as specified in IFSCA, including the following:
 1. Complaints received and processed;
 2. All correspondence exchanged between the Company and the client;
 3. All information and documents examined and relied upon by the Company while processing of the complaints/ grievance;
 4. Outcome of the complaints/ grievance;

5. Reasons for rejection of complaints, if any;
6. Timelines for processing of complaints/ grievance and
7. Data of all complaints/ grievances handled by it.
8. Pending litigation or legal proceeding relating to the complaint. *(The record shall be maintained for the applicable period, after final disposal of the proceeding.)*

REPORTING

Waterfield shall make necessary reporting to IFSC authorities in manner as specified.

REVIEW OF POLICY

- The Company shall reserve the rights to review and make amendment to the Policy from time to time as it deems fit in accordance with the applicable laws, rules and regulations for the time being in force. In the event of any conflict between the provisions of this Policy and the Act or Regulations or Rules or any other statutory enactments, the provisions of such Act or Regulations or Rules or statutory enactments shall prevail over this Policy. An interim review and amendment can also be carried out to accommodate minor changes, if any, in regulatory and operating front by the Compliance Officer of the Company.

We have also devised the below escalation matrix to facilitate an easy approach for clients before they file any grievance with IFSCA. The same is also displayed on our website:

Designation	Contact Person name	Address	Contact No. and Email ID	Working hours when complainant can call
Complaint Redressal Officer	Sweeti Suthar	04, Ground Floor, Block 15, Pragya Accelerator, Zone-1, Road 1C, GIFT City, Gandhinagar-382 050	+ 91 9106441879 sweeti.suthar@waterfieldadvisors.com ;	10:00 am to 6:00 pm
Complaint Redressal Appellate Officer	Biplab Bhattacharya	04, Ground Floor, Block 15, Pragya Accelerator, Zone-1, Road 1C, GIFT City, Gandhinagar-382 050	+ 91 9824006506 biplab.bhattacharya@waterfieldadvisors.com ;	10:00 am to 6:00 pm