

CAPEVIEW INVESTMENT MANAGERS PRIVATE LIMITED
Grievance Redressal Policy
Document Name : CIMPL/CO/GRP

**Grievance Redressal Policy (“The Policy”)**

**Version:2**

**Last reviewed/amended by the Board of Directors: June 12, 2024**

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## GRIEVANCE REDRESSAL POLICY

### 1. Background

Capeview Investment Managers Private Limited (hereinafter referred to as “**Sponsor**” or “**Investment Manager**”, where applicable) is the sponsor to, and the investment manager of the Edge Investments Trust (“**Fund**”), a Category II Alternative Investment Fund (“**AIF**”) registered with the Securities and Exchange Board of India (“**SEBI**”) under the Securities and Exchange Board of India (Alternative Investment Funds) Regulations, 2012 (“**AIF Regulations**”) (SEBI Registration No. IN/AIF2/18-19/0592). The Edge Credit Opportunities Fund I (“**Scheme**”) is the first scheme of the Fund.

The Investment Manager shall be deemed to have adopted this Policy in respect of each scheme of the Fund severally and not jointly. No rights, responsibilities or liabilities of any scheme of the Fund shall be attributed to any other scheme of the Fund. This Policy shall be deemed to be a separate Policy for each scheme of the Fund, and each reference herein to “Fund” shall be deemed to be a reference to each such scheme severally and not jointly. The term “Fund” is used collectively herein for the sake of convenience only and shall in no way be deemed to impose or create any joint duties, obligations or liabilities among the schemes of the Fund.

### 2. Objective

The objective of this Policy is to provide for efficient and effective grievance redressal mechanism for investors. This Policy has been formulated taking into account the following:

- (a) Investors are treated fairly at all times;
- (b) All complaints are dealt with efficiently and in a timely manner;
- (c) Confidentiality is maintained at all times;
- (d) Investors are informed of avenues to escalate their complaints/grievances; and
- (e) The employees work in good faith and without prejudice, towards the interests of the Investors.

Further, as per the SEBI circular dated December 10, 2021 (“**SEBI Circular**”), the data on investor complaints received against AIFs and each of their schemes and redressal status thereof, is required to be disclosed by all AIFs as per the specified format. While implementing this Policy, the Scheme shall also ensure compliance with the requirements of the SEBI Circular, including the requirement to maintain data on investor complaints as per the specified format, and compiling such data within 7 days from the end of each quarter.

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### 3. Creating Awareness on Grievance Redressal Mechanism

The Investment Manager is required to create awareness amongst the investors regarding the following:

- (a) Process for filing a complaint; and
- (b) Process for escalation of complaint in case of delayed or no response.

### 4. Resolution Process

It may be noted that only the grievances received in written form will be considered under the grievance redressal mechanism. The Investor shall address the complaint in the manner provided in **Annexure I** to this Policy.

Ms. Priya Maheshwari, Compliance Officer of the Investment Manager is designated as Grievance Redressal Officer under this Policy.

### 5. Changes to Policy

A review of this Policy would be carried out on an annual basis. Any material changes to this Policy that results in or could likely result in the obligations of the Investment Manager under this Policy, being diluted or becoming redundant, whether in letter or otherwise, shall be approved by the board of the Investment Manager ("**Board**"). An interim review can also be carried out to accommodate substantial changes, if any, on regulatory and operating front by the Compliance Officer of the Company.

- 6. Capitalised terms used herein but not defined, unless the context otherwise requires, shall have the meaning assigned to such terms in the private placement memorandum of the Fund.

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### Annexure I

#### **Resolution Process:**

- a) An investor may submit a complaint or grievance by duly completing the 'Investor Grievance Redressal Form' in the form set-out in **Schedule A** hereto, and submitting the same to:

Ms. Priya Maheshwari,  
Grievance Redressal Officer at [grievance@capeview.co.in](mailto:grievance@capeview.co.in)

- b) If the Investor is not satisfied by the resolution provided, he/she/they may also consult the Director of Investment Manager, whose details are mentioned below:

Board of Directors- Capeview Investment Managers Private Limited  
Escalation Email: [support@capeview.co.in](mailto:support@capeview.co.in)  
Address: 603, 6th Floor, Windsor, Off CST Road,  
Kalina, Santacruz (East), Mumbai - 400 098

In all cases, the Investment Manager shall redress grievance or provide requisite response within 21 calendar days from the date of receipt of the grievance.

- c) In case the Investment Manager has rejected the Complaint or the Investor has not received any communication from the Fund or is not satisfied with the reply received or the redressal by the Fund/Investment Manager, the Investor may file their complaint in [SCORES 2.0](https://scores.sebi.gov.in/scores-home) portal of SEBI i.e. <https://scores.sebi.gov.in/scores-home>. The Investor may lodge the Complaint against the Fund on SCORES 2.0 Portal within a period of one year from the date of occurrence of the cause of action i.e., rejection of complaint or non-receipt of any communication or reply / redressal received being not satisfactory.
- d) The investment Manager shall resolve the complaint and upload the Action Taken Report ("ATR") on SCORES 2.0 within 21 calendar days of receipt of such Complaint.
- e) In case the Investor is not satisfied with the resolution provided, the Investor may request for a review of the resolution provided by the entity within 15 calendar days from the date of the ATR by the Investment Manager. In case of review, SEBI shall take cognizance of the complaint through SCORES 2.0 and seek clarifications from the Investment Manager. The Investment Manager shall provide clarification to SEBI, wherever sought and within such timeline as specified. The review Complaint shall be treated as 'resolved' or 'disposed' or 'closed' only when SEBI 'disposes' or 'closes' the Complaint in SCORES 2.0
- f) At any stage or in case the Investor is not satisfied with the resolution provided from aforesaid method or in cases where the issues raised require adjudication on any third party rights, on questions of law or fact or which is in the nature of a lawsuit between parties, Investor will have an option to refer the complaint to ODR (Online Dispute Resolution) on <https://smartodr.in/login>. Once the Complaint has been referred to ODR, the same shall be treated as disposed of in SCORES 2.0.

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### Process for filing complaint through SCORES platform

The Investor needs to register on the SEBI SCORES 2.0 portal at <https://scores.sebi.gov.in/scores-home> by clicking on “Sign Up” and selecting the category as “Investor”. Details like Name of the Investor, Permanent Account Number (PAN), contact details, email-id, etc. are required at the time of registration on the Scores 2.0 Portal. Upon successful registration, a unique user id and a password shall be generated and communicated through an acknowledgement email to the Investor. The Investor may then proceed to submit a complaint or grievance directly to Edge Investments Trust under the ‘Category 2 Alternative Investment Fund’ category.

Investors may contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on the SCORES 2.0 platform. The list of IAs is available at [www.sebi.gov.in](http://www.sebi.gov.in). Investors may also seek assistance in filing complaints on SCORES 2.0 from SEBI's toll free helpline number 1800 266 7575 or 1800 22 7575.

### **Important links:**

SEBI SCORES 2.0	<a href="https://scores.sebi.gov.in/scores-home">https://scores.sebi.gov.in/scores-home</a>
SMART ODR	<a href="https://smartodr.in/login">https://smartodr.in/login</a>

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Schedule A  
EDGE INVESTMENTS TRUST

INVESTOR GRIEVANCE FORM

☐ Existing Investor- Individual                      ☐ Existing Investor- Non-Individual                      ☐ Other

**PERSONAL DETAILS:**

\*Name:

\*PAN:

\*Folio No (in case of existing investor):

**CONTACT DETAILS:**

\*Address:

\*Landline/Mobile:

\*Email ID:

**STATE YOUR GRIEVANCE**

1000 words

***\* Mandatory Fields***

I, the complainant, do hereby acknowledge that all the information provided in this complaint form are true to my knowledge, belief and understanding and no part of it, intentionally or otherwise, has been concealed and/or misrepresented thereof.

[End of the Form]