CAELIS VENTURES PRIVATE LIMITED

INVESTOR GRIEVANCE REDRESSAL POLICY

A. Introduction:

Caelis Ventures Private Limited (hereinafter referred to as "the Company") is registered with the Securities and Exchange Board of India (SEBI), vide SEBI registration no.: INP000010362, to act as a Portfolio Manager under SEBI (Portfolio Managers) Regulations, 2020 for Discretionary, Non-Discretionary and Advisory Portfolio Management Services.

This Investor Grievance Redressal Policy (hereinafter referred to as the “Policy”) outlines the framework for prompt and efficient resolution of complaints and concerns raised by investors in the Portfolio Management Services (PMS) offered by the Company. The goal is to provide a transparent, fair, and timely mechanism in compliance with applicable regulations.

B. Objective:

To set out a compliance process for resolution of investor grievances and to display the details of officials of the Company whom investors may approach as per requirements of SEBI Master Circular for Portfolio Managers on Information regarding Grievance Redressal Mechanism.

C. Complaint Redressal Mechanism:

Investors are entitled to make any complaint about a service matter or clarification directly in writing, orally or telephonically to the investor relations officer:

Name	Mr. Kushagra Pal
Designation	Investor Relations Officer
Address	Caelis Ventures Private Limited, C-9/23, First Floor, Chitrakoot Scheme, Ajmer Road, Jaipur - 302021
Telephone No.	+91 141-6780675 /+91 141-2992014
Email id	investorservices@caelisventures.in

However, if the query or matter is not resolved as per the timeline given, the Company provides the following mechanism to its investor to lodge and express their grievances:

- **Level 1 - Raise with the Company:**

  Grievances/concerns, if any, which may not be resolved/satisfactorily addressed in aforesaid manner shall be redressed through the administrative mechanism by the designated Compliance Officer, namely **Mr. Navdeep Singh Pundhir,** and subject to the SEBI (Portfolio Managers) Regulations, 2020. The Compliance Officer will endeavour to address such grievance in a reasonable manner and time. The coordinates of the Compliance Officer are provided as under:

Name	Mr. Navdeep Singh Pundhir
Designation	Compliance Officer
Address	Caelis Ventures Private Limited, C-9/23, First Floor, Chitrakoot Scheme, Ajmer Road, Jaipur - 302021
Telephone No.	+91 141-6780675 / +91 141-2992014
Email id	compliance@caelisventures.in

- **Level 2 - SEBI Complaints Redress Systems:**

  If Investors are still not satisfied with the response from the Company, they can lodge their grievances with SEBI at **https://scores.sebi.gov.in/** or may also write to any of the offices of SEBI or contact SEBI Office on Toll Free Helpline at 1800 266 7575 / 1800 22 7575.

- **Level 3 – ODR Platform:**

  After exhausting all aforementioned options for resolution, if the client is not satisfied, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at **https://smartodr.in/login**.

  Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with the Portfolio Manager is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.

  The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in SCORES guidelines or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law.

D. Disclosure of Complaints Data:

The details of the complaints including SCORES complaints related to PMS shall be disclosed on the website on a monthly basis by 7th of the succeeding month in the format as may be prescribed by SEBI from time to time.

E. Policy Review and Future Amendment:

The Company shall reserve the rights to 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, on regulatory and operating front by the Compliance Officer of the Company.