



Pi Square Bridge Way Long Short Fund (IFSC) LLP

Complaints Handling and Grievance Redressal Policy

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Complaint Redressal Officer (CRO)

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Complaints Handling and Grievance Redressal Policy

Objective

This Investor Grievance Policy establishes a structured framework for handling complaints and grievances from investors. It ensures fairness, transparency, and timely resolution in compliance with the guidelines issued by the International Financial Services Centres Authority (IFSCA).

Scope

This policy applies to all complaints and grievances raised by investors (excluding Group Entities) of the Pi Square Bridge Way Advisors LLP ("FME") operating in GIFT-IFSC.

Overview

Pi Square Bridge Way Advisors LLP is registered with International Financial Services Centers Authority ('IFSCA') as Registered FME (Retail) under the IFSCA (Fund Management) Regulations 2022 ('IFSCA FM Regulations'). Pi Square Bridge Way Advisors LLP is authorized to act as an investment manager of various schemes, retail and non-retail fund, which is registered with and regulated by IFSCA under the IFSCA FM Regulations 2022.

The IFSCA has issued the Circular titled "Complaint Handling and Grievance Redressal by Regulated Entities in the IFSC" dated December 02, 2024, which provides for regulatory framework for handling of complaints and redress of grievances by the regulated entities in the International Financial Services Centre (IFSC), which inter alia provides detailed norms and requirements pertaining to policy for complaint handling and grievance redressal, procedure for complaint handling along with timelines, appeal mechanism, maintenance of records, disclosures on website and annual report, reporting and maintenance of online system for complaint handling.

In line with the aforesaid requirement, the designated partners have approved this policy on Complaint Handling and Grievance Redressal policy for investor complaints.

Definition

- a. "Complaint Redressal Appellate Officer" or "CRAO" shall be Principal Officer of the Pi Square Bridge Way Advisors LLP as designated by the Board of the Pi Square Bridge Way Advisors LLP for handling appeals of consumers against the decision taken by the Complaint Redressal Officer of the Pi Square Bridge Way Advisors LLP;
- b. "Complaint Redressal Officer" or "CRO" shall be Compliance and Risk Manager, as designated by the Board of the DSP IFSC, responsible for handling of complaints received from its consumers;
- c. "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, as amended from time to time;



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Explanation: Customer" or "Client" shall mean a person who is engaged in a financial transaction or activity with Pi Square Bridge Way Advisors LLP and includes a person on whose behalf the person engaged in the transaction or activity, is acting.

- d. "Group Entity" means an entity of a business group that consists of a parent company or of any other type of legal person exercising control over the rest of the group, together with branches and/or subsidiaries;
- e. "Non-retail" consumer means a person that is considered as a "non-retail" under the regulatory framework specified by the Authority:

Explanation I: Where the differentiation between "retail" vs. "non-retail" has not been specified in the regulations issued by the Authority for any specific business activity, the non-individual consumers shall be considered as "non-retail" consumers for the purpose of this circular

Explanation II: All the investors participating in a scheme launched by a registered FME (Nonretail) or Authorised FME shall qualify as "non-retail" consumers;

- f. "Professional Consumer" shall mean an accredited investor as covered under the circular titled 'Accredited Investors in IFSC' dated January 25, 2024, as amended; a professional client as covered under the IFSCA Banking Handbook, as amended; or a corporate policy holder;
- g. "Retail Consumer" for the purpose of this circular shall mean a consumer of a Regulated Entity other than Professional Consumer and non-retail consumer.

Policy for Complaint Handling and Grievance Redressal

(A) General Provisions:

- a. Pi Square Bridge Way Advisors LLP shall have a policy on handling of complaints and grievance redressal, duly approved by its governing body or its Board of Directors, as applicable. The policy shall have adequate mechanisms for receiving, handling and redress of complaints in a fair, transparent and timely manner.
- b. The policies and procedures for complaint handling and grievance redressal shall consider the nature, scale and complexity of its business along with its size and organizational structure.
- c. Pi Square Bridge Way Advisors LLP shall examine and process the complaint in accordance with policies and procedures as specified under the Applicable Laws including circulars and guidelines issued by IFSCA from time to time.

(B) Complaint Handling Procedure:

- a. Any investor who wishes to file any complaint or grievance with Pi Square Bridge Way Advisors LLP can send an email to pisquaregiffund@gmail.com or write a letter and post it to the registered office.
- b. On receipt of a complaint, CRO of the Pi Square Bridge Way Advisors LLP shall make an assessment on the merits of the complaint. Pursuant to assessment,



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- i. In case of acceptance, Pi Square Bridge Way Advisors LLP shall acknowledge acceptance of complaints, in writing, within 3 working days of receipt of the complaint.
- ii. In case of non-acceptance, Pi Square Bridge Way Advisors LLP shall inform the complainant within 5 working days along with reasons.

- c. Pi Square Bridge Way Advisors LLP shall examine and process the complaint in a fair, transparent, professional and impartial manner.
- d. Pi Square Bridge Way Advisors LLP 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 transaction which is the subject matter of the complaint, the complaint shall be handled by another officer designated by Pi Square Bridge Way Advisors LLP, in a fair and impartial manner.
- e. Pi Square Bridge Way Advisors LLP may ask for additional information from the complainant while processing the complaint.
- f. Pi Square Bridge Way Advisors LLP shall dispose of complaint preferably within 15 days but ordinarily not later than 30 days of acceptance of complaint. Pi Square Bridge Way Advisors LLP may either resolve the complaint or reject the complaint.
- g. In case of rejection of a complaint, Pi Square Bridge Way Advisors LLP shall give reasons for rejection of the complaint, in writing.

(C) Appeal Mechanism

- a. If a complainant is not satisfied with the resolution provided by Pi Square Bridge Way Advisors LLP or if the complaint has been rejected by Pi Square Bridge Way Advisors LLP, the complainant may file an appeal before the CRAO of Pi Square Bridge Way Advisors LLP preferably within 21 days from the receipt of the decision from the CRO.
- b. The CRAO of a Pi Square Bridge Way Advisors LLP shall be at the level of or one level below a Key Managerial Personnel
- c. The CRAO shall dispose of the Appeal within a period of 30 days.

(D) Complaint before the Authority/ Escalation to IFSCA

Where a complainant is not satisfied with the decision of Pi Square Bridge Way Advisors LLP and has exhausted the appellate mechanism of Pi Square Bridge Way Advisors LLP, he 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 Pi Square Bridge Way Advisors LLP.

(E) Maintenance of records

- a. The Regulated Entity shall maintain all records relating to handling of complaints, including the following:
 - i. Complaints received and processed
 - ii. All correspondence exchanged between Pi Square Bridge Way Advisors LLP and the complainants
 - iii. All information and documents examined and relied upon by Pi Square Bridge Way Advisors LLP while processing of the complaints
 - iv. Outcome of the complaints;
 - v. Reasons for rejection of complaints, if any;



- vi. Timelines for processing of complaints;
- vii. Data of all complaints handled by it.

b. Pi Square Bridge Way Advisors LLP shall maintain records in electronic retrieval form for the same period as mandated by the Authority under the relevant and applicable regulations and circulars, handbooks, guidelines thereunder:

Provided that in case there is no specific mention of such time period, the record shall be maintained for at least six years from the date of disposal of complaint:

Provided further that in case of any pending litigation or legal proceeding relating to the complaint, the record shall be maintained for the applicable period, after final disposal of the proceeding.

(F) Reporting

- a. Pi Square Bridge Way Advisors LLP shall file reports on handling of complaints in the form and manner specified by the Authority from time to time.
- b. Pi Square Bridge Way Advisors LLP shall have a section with heading “Complaint Handling and Grievance Redressal” in its Annual Report, if the entity is required to file an annual report for its business activities in the IFSC under the applicable laws. The section shall also provide data of all complaints received, resolved, rejected and pending during the year in a tabular/ graphical format:

Provided that where a Pi Square Bridge Way Advisors LLP is not required to file an annual report for its business activities in the IFSC, it shall display the information on complaint handling on its website or on a dedicated webpage of its Group Entity, as applicable, under the heading “Complaint Handling and Grievance Redressal”, on an annual basis.

(G) Online system for complaint handling

A FME may choose to develop an online system for complaint handling depending upon the nature, scale and complexity of its business along with its size and organizational structure.

(H) Role of Compliance Officer

The compliance officer of Pi Square Bridge Way Advisors LLP shall ensure that handling and disposal of complaints by Pi Square Bridge Way Advisors LLP are in accordance with the regulatory requirements specified by IFSCA.

Explanation: The responsibilities on any other official (such as principal officer) w.r.t. grievance redressal mentioned in the regulations, under which Pi Square Bridge Way Advisors LLP is registered or authorized or licensed with the Authority, shall also continue to apply.

(I) Enforcement

Non-compliance with this policy may result in regulatory actions by IFSCA, as specified under the International Financial Services Centres Authority Act, 2019.

(J) Review and Updates

This policy will be reviewed annually or as required to comply with any changes in regulatory requirements.