

## **Grievance Redressal Policy - AIF**

**Lumis Labs Fund:** Registered with SEBI as a Category II Alternative Investment Fund  
(Registration No. IN/AIF2/21-22/0952)

**Trustee:** Orbis Trusteeship Services Private Limited

**Sponsor:** Agarsha Investment Manager Private Limited

**Investment Manager:** Lumis Labs Investment Manager Private Limited

Version Control:

Version	Reviewer	Approval	Date
1.0	Compliance Officer	Board of IM	15.12.2023
2.0	Compliance Officer	Board of IM	15.05.2025

## 1. Introduction:

Lumis Labs Fund (“LLF”) is an Alternative Investment Fund (“AIF”) registered with the Securities and Exchange Board of India (“SEBI”).

At LLF, we believe that prompt and efficient service is essential for retaining existing relationships and therefore, investor satisfaction is paramount for us. This Grievance Redressal Policy (“Policy”) details grievance handling process through a structured grievance redressal framework.

Communication about lapses by the LLF received from the investors will be considered as a complaint for consideration under the Policy if the communication meets the broad parameters as defined herewith:

- (i) Those lapses that result in grievances and can be substantiated / proved by the investor to have occurred due to undue delay / error of LLF in the normal course be considered as a complaint.
- (ii) In case the lapse is due to misinformation or mistake on the part of the investor or any external agency not appointed by LLF, then such a lapse will not be treated as a complaint.

These parameters are indicative as of the date of the policy and LLF can amend these parameters over a period of time at regular intervals after taking into account the nature of interactions with the investors for considering the same as complaint. Parameters that are wide and have more than one interpretation would be interpreted as per set industry practices / proven nomenclature / precedents for the benefit of the Investors.

The duties and obligations of the Investor Relation Officer under this Policy shall be the same as those of a Compliance Officer under the Guidelines.

## 2. Framework:

The Investment Manager shall designate one of its personnel as the investor relation officer (“**Investor Relation Officer**”) who shall seek to attend to and address any investor complaint at the earliest. The Investment Manager will ensure that this official is vested with the necessary authority and independence to handle complaints received from the investors.

Investors can contact the Investor Relations Officer for any queries / complaints.

Any dispute unresolved by the above internal grievance redressal mechanism of the Investment Manager, may be submitted to arbitration under the Arbitration and Conciliation Act, 1996. The arbitration shall be held in accordance with the terms of the Contribution Agreement.

The investor may register any unresolved grievance/complaint through SCORES (SEBI

Complaints Redress System) available at <http://scores.gov.in> in accordance with the terms of this Policy and the guidelines issued by SEBI. LLF's SCORES registration number is AIF0084.

### **3. Register Compliant Through Investor Relation Officer/Compliance Officer:**

Investors can seek clarification to their query and are further entitled to make a complaint to the Investor Relation Officer through any of the modes mentioned below on any business day between 9.00 am to 6.00 pm to register their queries / complaints:

Name: **Sneha Dadrwal**

Contact number: +91 9818084541

Email Id: [sneha.dadrwal@oisterglobal.com](mailto:sneha.dadrwal@oisterglobal.com)

Postal Address: Lumis Labs Investment Manager Private Limited, Two Horizon Center, Suite 628 - 629, Level 6 Wing B, Golf Course Road, DLF Phase V, Sector 43, Gurugram, Haryana - 122002

In the normal course, all complaints received by the Investor Relation Officer will be responded within 7 business days & the Investor Relation Officer shall endeavour to resolve the complaint within 30 days from the date of receipt.

### **4. Register Unresolved Complaint on SEBI's SCORES Portal:**

The Investor can lodge their unresolved grievance by registering themselves on SEBI SCORES platform at <http://www.scores.gov.in> portal developed by SEBI for grievance redress mechanism in accordance with the SEBI Circular SEBI/HO/OIAE/IGRD/P/CIR/2022/ dated November 07, 2022 within one year of the cause of action if:

- (i) the complainant has approached LLF through the Investors Relation Officer, for redressal of the complaint, and,
- (ii) The Investor Relation Officer has rejected the complaint or,
- (iii) The Investor has not received any communication from the Investor Relation Officer or,
- (iv) The Investor is not satisfied with the reply received or the redressal action taken by the Investor Relation Officer.

The Investor may also use SCORES platform to submit the complaint or grievance directly to LLF. Such a complaint is called a "Direct Complaint" and shall be redressed by the entity within 30 days without any intervention of SEBI, failing which the complaint shall be registered on SCORES. Thereafter, SEBI shall take it up with the

entity concerned.

#### **5. Redressal Mechanism to Handle Investor Complaints:**

All queries/complaints received by the Investor Relation Officer will be investigated within such timelines at the different levels of escalation as mentioned above. Certain types of queries/complaints, involving fraud, legal inputs, and third parties, needing more time for investigation, are acknowledged accordingly and the turnaround time is communicated to the investor.

#### **6. Policy Review**

This Policy shall be amended as and when necessary, with the approval of the Board of the Investment Manager.