INVASSET LLP

SEBI: INP000006907

GRIEVANCE REDRESSAL POLICY

INTRODUCTION:

INVASSET LLP ("INVASSET"), a SEBI-registered Portfolio Manager (Registration No. INP000006907), is committed to the prompt, transparent, and fair resolution of investor grievances in accordance with the SEBI (Portfolio Managers) Regulations, 2020, the SEBI Master Circular for Portfolio Managers SEBI/HO/IMD/IMD-POD-1/P/CIR/2025/104 dated 16-July-2025 (as amended from time to time), and other applicable SEBI circulars, including Circular No. SEBI/HO/IMD/IMD-II_DOF7/P/CIR/2021/681 dated December 10, 2021. This Policy sets out the framework and procedures for lodging, handling, and resolving investor complaints, and is aligned with the SEBI Complaints Redress System (SCORES) and other prescribed regulatory mechanisms. Investor protection and timely grievance redressal form an integral part of INVASSET's governance and compliance standards.

Investor feedback and complaints are key to improve our services. Not each difficult interaction with investor is a complaint. Invasset has established principles and framework handle both queries and grievances.

At **INVASSET**, we ensure that:

1. Investors are treated fairly
2. Complaints raised by Investors are dealt with courtesy and in a timely manner
3. Investors are provided with information on how to raise their issues and complaints and escalate if they are not satisfied with the resolution or handling.
4. A dedicated Customer Services Team is in place to handle customer queries and complaints. The process is supervised by a senior resource

Grievance Raising Mechanism

INVASSET provides multiple channels for investors to register their complaints or queries. Investors may lodge a grievance through any of the following means:

1. Investors are entitled to make a complaint in writing, orally or telephonically directly to **INVASSET**. Investors that are serviced by their independent advisors or distributors can also raise their complaints through their advisors and distributors.
2. Investors can reach **INVASSET** through email at: info@invasset.com
3. Investors can call us at toll free: **+91 98158-10172**
4. Investors can send letters to Invasset at: INVASSET, Plot No. 14 & 15, 1st Floor, Canal Road South City, Ludhiana, Punjab – 142027
5. Website Complaint Link: Use the dedicated grievance section on our website (www.invasset.com) to submit complaints online. We have enabled a web-based complaint link as the primary digital channel for lodging grievances.

(Note: INVASSET currently does not offer a mobile app for complaint lodging, the website serves as the official platform)

6. If Investor is not satisfied with the response received at first level, the complaint may be escalated to the Compliance Officer/Grievance Officer of INVASSET.

Mr. Parvesh Kumar, is the Designated Grievance Redressal Officer overseeing investor complaints. Investors may escalate any unresolved or urgent grievances to the Compliance Officer at:

Email: parveshkumar@invasset.com, Tel: +91 99156-13625

The Compliance Officer reviews escalated complaints and ensures fair resolution in accordance with regulatory requirements and his contact details are also provided to investors as required by SEBI Regulations.

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

INVASSET is registered on the SCORES/SCORES 2.0 platform (SEBI rolled out the upgraded SCORES 2.0 with effect from 1-April-2024) and responds to complaints in accordance with SEBI-prescribed timelines. Our website provides a direct link to the SCORES website i.e https://scores.sebi.gov.in/

Note: SCORES 2.0 features auto-routing of complaints to the concerned intermediary, auto-escalation on breach of timelines, and built-in time-bucket discipline. INVASSET responds to investor complaints through the SCORES 2.0 portal in line with the SCORES Master Circular, as amended from time to time and within the timelines stipulated by SEBI from time to time.

SCORES Mobile App: For convenience, SEBI's SCORES is also accessible via mobile application. Investors may download the app (available on Android and iOS) to lodge and track complaints on the go.

7. **Online Dispute Resolution (ODR) Mechanism – SMART ODR Platform**

In accordance with SEBI Circular No. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/145 dated July 31, 2023 and updated as on August 04, 2023 with subsequent Further amendments, investors may access the Online Dispute Resolution (ODR) mechanism through the SEBI-designated SMART ODR portal.

If an investor is not satisfied with the resolution provided by INVASSET through its internal grievance redressal mechanism or through the SCORES platform, the investor may initiate dispute resolution proceedings through:

SMART ODR Portal: https://smartodr.in

The SMART ODR platform facilitates:

- Online Conciliation
- Online Arbitration
- Time-bound and cost-effective dispute resolution

Investors are required to first exhaust INVASSET's internal grievance mechanism and the SCORES process before approaching the ODR portal. The ODR mechanism is in addition to and without prejudice to any other legal remedies available under applicable law.

For ease of access and investor convenience, a direct link to the SMART ODR portal is also provided on the official website of INVASSET under the grievance redressal section.

INVASSET shall participate in ODR proceedings in good faith and comply with applicable regulatory requirements.

Internal Grievance Redressal Process

1. At the First Level, the Customer Relations Team receiving the query/complaint is responsible for the resolution of query/complaint. The Senior Manager-Customer Relations is responsible for ensuring that the query/complaint is resolved to the investor's satisfaction and must attempt to offer the investor alternate solutions. However, if the investor remains unsatisfied with the first response or solution, the issue shall be escalated to the next level for further review.

2. At the second level, the Compliance Officer (Grievance Redressal Officer) reviews escalated or unresolved complaints. The Compliance Officer will assess the issue and work with relevant teams to provide a fair resolution or alternative solution.

3. We aim to acknowledge and respond to queries in two working days and endeavor to resolve complaints within 5 to 7 working days of receipt. However, in all cases, complaints shall be acknowledged and resolved within the timelines prescribed under applicable SEBI regulations and the SCORES framework. Certain types of queries/complaints, involving fraud, legal inputs and third party (distributors, service providers) needing more time for investigation, are acknowledged accordingly and the

turnaround time is communicated to the investor.

4. INVASSET is committed to clear and investor-friendly communication. We provide the investor with a resolution response that details our findings, decision and any remedial actions. All responses are given in writing (via email or letter) or the same medium through which the complaint was received, unless otherwise requested. Our goal is to ensure the investor fully understands the outcome and the rationale for the resolution.

5. Closure and Further Recourse: A complaint shall be treated as resolved when a reasoned response addressing the grievance has been communicated to the investor and either the investor has accepted the resolution or no further correspondence is received within a reasonable period, subject to applicable SEBI guidelines. If the investor remains dissatisfied, they may escalate the complaint outside INVASSET through regulatory avenues as described in the next section.

6. INVASSET ensures that all communications regarding grievance redressal are clear, reasoned and conveyed in an investor-friendly manner.

Note: As part of our regulatory compliance, all complaints and their resolutions are recorded and monitored internally.

Additionally, as described in a later section, we disclose summary data of complaints on our website on a monthly basis in the prescribed format, within seven (7) working days from the end of every calendar month in accordance with SEBI Circular No. SEBI/HO/IMD/IMD-II_DOF7/P/CIR/2021/681 dated December 10, 2021 and subsequent updates. All complaints and their resolutions are recorded and monitored internally for compliance purposes.

Details of SEBI grievance redressal mechanism and how to access it

1. It is mandatory for every PMS provider to register itself on SEBI SCORES (SEBI Complaint Redress System). SCORES is a centralized online complaint resolution system through which the complainant can take up his grievance against the PMS provider and subsequently view its status. (https://scores.sebi.gov.in)
2. The details such as the name, address and telephone number of the investor relations officer of the PMS provider who attends to the investor queries and complaint should be provided in the PMS Disclosure document.
3. The grievance redressal and dispute mechanism should be mentioned in the Disclosure Document. Investors can approach SEBI for redressal of their complaints. On receipt of complaints, SEBI takes up the matter with the concerned PMS provider and follows up with them.
4. Investors may send their complaints to: Office of Investor Assistance and Education, Securities and Exchange Board of India, SEBI Bhavan. Plot No. C4- A, G‟ Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051

Expectations from the investors (Responsibilities of Investors)

1. Check registration status of the intermediary from SEBI website before availing services.
2. Submission of KYC documents and application form in a timely manner with signatures in appropriate places and with requisite supporting documents.
3. Read carefully terms and conditions of the agreement before signing the same.
4. Thorough study of the Disclosure Documents of the PMS to accurately understand the risks entailed by the said investment in PMS.
5. Accurate and sincere answers given to the questions asked in the Client Information sheet which include client risk profiling‟ shall help the PMS provider properly assess the risk profile of the investor.
6. Thorough study of the quarterly statements sent by the PMS provider to the investor intimating him about the portfolio's absolute and relative

performance, its constituents and its risk profile.

7. Ensure providing complete details of negative list of securities as part of freeze instructions at the time of entering into PMS agreement and every time thereafter for changes, if any, in a timely manner.
8. To update the PMS provider in case of any change in the KYC documents and personal details and to provide the updated KYC along with the required proof.

Complaint Data of INVASSET in terms of SEBI Circular SEBI/HO/IMD/IMD-II_DOF7/P/CIR/2021/681 dated December 10, 2021 Data for the month ending – October, 2026

Sr. No.	Received from	Pending at the end of last month	Received	Resolved*	Total Pending#	Pending complaints > 3months	Average Resolution time^ (in days)
1	Directly from Investors	0	0	0	0	0	NA
2	SEBI (SCORES)	0	0	0	0	0	NA
3	Other Sources (if any)	0	0	0	0	0	NA
	Grand Total	0	0	0	0	0	NA

^Average Resolution Time is calculated as the sum total of time taken to resolve each complaint in days during the month divided by the total number of complaints resolved during the month.

^Where only one complaint is resolved during the reporting period, the total time taken to resolve that complaint is reflected as the average resolution time.

Trend of monthly disposal of complaints

Sr. No.	Month	Carried forward from previous month	Received	Resolved*	Pending#
1	July, 2026	0	0	0	0
2	August, 2026	0	0	0	0
3	September, 2026	0	0	0	0
4	October, 2026	0	0	0	0
	Grand Total	0	0	0	0

*Inclusive of complaints of previous months resolved in the current month. #Inclusive of complaints pending as on the last day of the month

Trend of annual disposal of complaints

SN	Year	Carried forward from previous year	Received	Resolved**	Pending**
1	2019-20	0	0	0	0
2	2020-21	0	0	0	0
3	2021-22	0	0	0	0
4	2022-23	0	0	0	0
5	2023-24	0	0	0	0
6	2024-25	0	0	0	0
7	2025-26	0	5	5	0
8	2026-27 (till October, 2026)	0	0	0	0
	Grand Total	0	5	5	0

** Inclusive of complaints of previous years resolved during the current year. ## Inclusive of complaints pending as on the last day of the respective financial year.

DISCLOSURE

This Grievance Redressal Policy is published on the official INVASSET website and is also referenced in our Disclosure Document for client awareness. Investors can obtain a copy of this policy from our website or by requesting it from our office. The policy will be updated from time to time to incorporate changes in regulatory requirements or internal processes and the updated version will be made available on the website and filed with SEBI as needed.

By adhering to the above policy, INVASSET aims to provide a timely and effective redressal of investor grievances and uphold the highest standards of investor protection and transparency in its Portfolio Management Services.