

BLUEOCEAN ASSET MANAGEMENT PRIVATE LIMITED

(Alternative Investment Fund - Category III)

GRIEVANCE REDRESSAL POLICY

Document Control:

Item	Description
Title	Grievance Redressal Policy
Policy Owner	BlueOcean Compliance Team
Effective Date	29/07/2025
Approved By	Board of Directors
Version Number	1.0

Version History:

Version Number	Date of Creation/change	Description of Change	Author	Approved By
1.0	29/07/2025	Formulation of Policy	Compliance Team	Board of Directors

Table of Contents

1. INTRODUCTION	4
2. PURPOSE	4
3. OBLIGATIONS OF THE INVESTMENT MANAGER	4
4. GRIEVANCE REDRESSAL FRAMEWORK	5
5. INTERNAL GRIEVANCE REDRESSAL PROCESS	6
6. DISCLOSURE	7
7. REVIEW OF POLICY	7

1. INTRODUCTION

BlueOcean Asset Management Private Limited (hereinafter referred to as “AMC”) acts as an Investment Manager to SEBI registered Category III Alternative Investment Fund, BlueOcean Capital India Trust (“Fund”) bearing registration number IN/AIF3/25-26/1865.

2. PURPOSE

Investor service is a vital element for sustained business growth and we want to ensure that our investors receive exemplary service across different touch points of the fund cycle. Prompt and efficient response to any investor request/query/grievance/complaint is essential to retaining existing relationships and therefore investor satisfaction becomes critical to us. Investor queries and complaints constitute an important voice of the investor, and this policy details grievance handling through a structured grievance redressal framework. Our grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in future.

This policy has been framed in accordance with Regulation 24 of SEBI (AIF) Regulations, 2012 and as per Securities and Exchange Board of India (SEBI) Master Circular SEBI/HO/AFD-1/AFD-1-PoD/P/CIR/2024/39 dated May 07, 2024 and sets out the process that will be followed by the AMC in the event of an investor grievance. Grievances include allegations such as failure to disclose conflicts of interest, misrepresentations, etc. and complaints regarding processing of drawdown transactions, distribution of units etc. Investor feedbacks, queries/clarifications will not be considered as instances of complaint or grievance.

3. OBLIGATIONS OF THE INVESTMENT MANAGER

The AMC will endeavour to address investor grievances in a swift and effective manner within a time period of 21 calendar days from the date the grievance is raised. It will also aim to prevent the occurrence of similar grievances in the future.

The AMC will ensure that appropriate resources are dedicated for redressal of issues and queries in a timely manner. Specifically, grievance redressal will be geared towards achieving the following outcomes:

- i. Investors are treated fairly, reasonably, and justly at all times.
- ii. Investor complaints and grievances are dealt with courteously and every attempt is made to resolve issues in a time-bound manner.
- iii. Investor confidentiality and privacy is always maintained and
- iv. Investors are periodically informed about the status and actions taken.

The AMC will inform the investors regarding the following options available for grievance

redressal:

- i. Registration of complaint:
 - a. with the Investment Manager through email/ letter; or
 - b. with SEBI through posting on the SEBI Complaints Redress System (SCORES) website; and
- ii. Online Dispute Resolution and Other Remedies

4. GRIEVANCE REDRESSAL FRAMEWORK

Investor queries and complaints arise due to lack of understanding or a deficiency of service experienced by investors. Deficiency of service may include lack of explanation, clarifications, understanding which escalates into shortfalls in the expected delivery standards, either due to inadequacy of facilities available or through the attitude of staff towards investors. Investors can seek clarifications to their query and are further entitled to make a complaint in writing, orally or telephonically directly to the AMC

- It is mandatory for the Investor having grievance to take up the matter directly with AMC at first place.
- For complaints the Investors can directly reach AMC through email at: operations@blueoceancapital.co.in
- Investors can contact AMC through telephone at: +91 22-47489020
- Investors can send letters to AMC at: 902, Raheja Chambers, Free Press Journal Marg, Nariman Point, Mumbai - 400021
- AMC shall endeavour to redress the Investor complaint(s) within 21 (twenty-one) calendar days from the date of the receipt of the complaint by AMC.
- If Investors are still not satisfied with the response from AMC , they can lodge their grievances with SEBI at SCORES 2.0 portal (<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. The complaint shall be lodged on SCORES within one year from the date of cause of action, where the complainant has approached AMC , for redressal of the complaint and
 - AMC has rejected the complaint or,
 - The complainant has not received any communication from AMC or,
 - The complainant is not satisfied with the reply received or the redressal action taken by AMC .

- AMC shall submit an Action Taken Report (“ATR”) on SCORES within 21 Calendar days. If Client is not satisfied with the Redressal or no ATR has been filed within the above mentioned days by the AMC, then the client can opt for 1st review within 15 days. Thereafter, the complaint shall be escalated to the Designated body.
- The Designated Body shall seek clarification from AMC or the client, as required. Once the designated body has received the clarification then they shall upload the revised ATR on SCORES within 10 days.
- If the Complainant is not satisfied with the 1st review or the ATR is not uploaded by the designated body in 10 days, then the Complainant can opt for 2nd review within 15 days. Thereafter, the complaint shall be escalated to the supervising official of the dealing officer of SEBI and he shall seek clarifications from the AMC or the client for the same.
- If satisfied, SEBI shall dispose the Complaint with reasonable closure remarks & if not satisfied then SEBI shall advice the client to opt for Online Dispute Resolution by registering the complaint on Online Dispute Resolution Portal (“ODR Portal”) at <https://smartodr.in/login>

Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with AMC 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.

5. INTERNAL GRIEVANCE REDRESSAL PROCESS

Queries/Complaints are investigated within the stipulated timelines at the different levels of escalation. Certain types of queries/ complaints, involving fraud, legal inputs and third party, needing more time for investigation, are acknowledged accordingly and the turnaround time is communicated to the investor. The prompt communication of AMC’S stand on any issue is important and is done clearly in an investor friendly manner.

6. DISCLOSURE

AMC's are advised to bring to the notice of their clients the Investor Charter, as prescribed by SEBI, by prominently displaying on their website/Private Placement Memorandum (PPM)/ mobile apps stating investor grievance redressal mechanism, etc.

Data on investor complaints received against Alternative Investment Fund (AIF) and each of their schemes and redressal status thereof shall be disclosed by all AIFs as per prescribed format as a separate chapter in the PPM.

For effective monitoring, AMC shall also maintain data on investor complaints as per prescribed format, which shall be compiled latest within 7 days from the end of quarter.

7. REVIEW OF POLICY

The Grievance Redressal Policy will be reviewed as and when warranted due to the changes in the regulatory framework, business or operational reasons and best practices as may be deemed appropriate.