



OAKTREE
Part of Brookfield

GRIEVANCE REDRESSAL POLICY

FOR

The Funds managed by OCM India IFSC Private Limited

(Manager)

Adopted on October 2025

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I. Introduction

1. OCM India IFSC Private Limited (“**Manager**”) is the investment manager to the funds as mentioned in Annexure A (“**Funds**”). The Funds are restricted scheme – category III alternative investment funds (“**AIFs**”) settled as close ended, contributory trusts under the provisions of the Indian Trusts Act, 1908 pursuant to the indentures of trusts dated 21 January 2025 and the amended and restated indenture of trust of India Opportunities XI IFSC Alternative Investment Fund I dated 02 September 2025 (“**Trust Deeds**”) and are duly regulated by the International Financial Services Centre Authority (“**IFSCA**”) under the IFSCA (Fund Management) Regulations, 2025 (“**FM Regulations**”).
2. Vistra ITCL (India) Limited (“**Trustee**”) has delegated its powers, duties and responsibilities under the Trust Deeds to the Manager pursuant to investment management agreement dated 21 March 2025 and the amended and restated investment management agreement of India Opportunities XI IFSC Alternative Investment Fund I dated 07 October 2025 (“**Investment Management Agreements**”). The Manager renders investment management services to the Funds. The private placement memorandum, Investment Management Agreements, contribution agreement(s) and Trust Deeds of the respective Fund(s) shall collectively be referred to as the “**Fund Documents**”. All capitalized terms used but not defined herein shall have the meaning ascribed to such terms under the Fund Documents.

II. Effective Date

This Policy will be effective from the date of receipt of approval from the board of directors of the Manager or the Trustee to the Funds, whichever is later.

III. Purpose

1. Contributor service is a vital element for sustained business growth, and it will be the Manager's aim to ensure that Contributors receive exemplary service across different touch points of a Fund cycle. Prompt and efficient service is essential for retaining existing relationships and therefore Contributor satisfaction becomes critical. Complaints by Contributors constitute an important voice of the Contributors, and this grievance redressal policy (“**Policy**”) details grievance handling through a structured grievance redressal framework. Grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in the future.
2. A complaint includes a formal written communication submitted by a Contributor, reporting an identifiable harm, deprivation of a right, loss suffered by such Contributor on account of an action or an omission on the part of the Fund and/or the Manager, contrary to the duties and obligations of the Manager and/or the Fund under Applicable Law or in its fiduciary capacity. It also includes allegations such as failure to disclose conflicts of interest, misrepresentations, etc. and complaints regarding discriminatory treatment among various classes of unit holders, distribution of units etc. (“**Complaint**”). However, the following instances will not be considered as a complaint:
 - (a) Anonymous complaints (except whistleblower complaints);
 - (b) Incomplete or un-specific complaints;
 - (c) Allegations without supporting documents;
 - (d) Suggestions or seeking guidance/explanation;



- (e) Complaints on matters not relating to the financial products or services provided by the Funds;
 - (f) Complaints about any unregistered/ un-regulated activity; and
 - (g) References in the nature of seeking information or clarifications about financial products or services.
3. This Policy is not intended to create third party rights or duties, nor is it intended to form part of any contract between the Manager and any Contributor in the Funds.

IV. Obligations of the Manager

The Manager will endeavor to address grievances or complaints of Contributors in a swift and effective manner within the timelines prescribed under this Policy. It will also aim to prevent the occurrence of similar grievances in the future.

The Manager will ensure that appropriate personnel are designated for grievance redressal in accordance with the Applicable Law and resources are dedicated for redressal of complaints, issues and queries in a timely manner. Specifically, grievance redressal will be geared towards achieving the following outcomes:

- (a) Contributors are treated fairly and in an impartial manner, reasonably, and justly at all times;
- (b) Complaints and grievances of Contributors are dealt with courteously and every attempt is made to resolve issues in a time-bound manner;
- (c) Confidentiality and privacy is always maintained and complaints are dealt with utmost professionalism;
- (d) The Contributor is periodically informed about the status and actions taken in respect of its complaint.
- (e) The Complaint is examined and processed in a fair, transparent, professional and impartial manner.

V. Grievance Redressal framework

1. **Complaint with Manager**

- (a) Complaints arise due to lack of understanding, or a deficiency of service experienced by Contributors. Deficiency of service may inter alia 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 Contributors. Contributors can seek clarification to their query and are further entitled to make a Complaint in writing in a manner set out herein.
- (b) The Contributor can contact the Chief Redressal Officer (“CRO”), appointed for the purposes of immediate redressal of Complaint of Contributors, to lodge a Complaint through the following modes:
 - (i) Email: Investors can send an email to gift-compliance@oaktreecapital.com.



- (ii) Letter: Investors can write to the Manager with their Complaint at the registered office address as mentioned here:

ATTN: Chief Redressal Officer
Unit No.C_116, Plot T1&T4, Road 13, Block 11, SEZ GIFT, Gift City, Gandhi Nagar, Gujarat, 382355, India
- (c) Upon receipt of a Complaint, the CRO shall assess the merits of the Complaint and pursuant to the assessment of the Complaint, acknowledge the Complaint in writing within the timeline as set out below:
 - (i) In case of acceptance of Complaint: within 3 (three) working days of the receipt of the Complaint; and
 - (ii) In case of non-acceptance: within 5 (five) working days along with reasons for rejection of Complaint in writing.
- (d) The CRO may ask for additional information from the Contributor while processing the Complaint.
- (e) Complaints received shall be disposed off within 15 (fifteen) days and but no later than 30 (thirty) days of acceptance of the Complaint.

2. Appeal Mechanism:

- (a) The complainant, if not satisfied with the resolution provided by the CRO, may file an appeal before the complaint redressal appellate officer (“**CRAO**”) within 21 (twenty one) days from the receipt of the decision of the CRO. The CRAO shall be a senior level person of the Manager designated for handling appeals of Contributors against the decision of the CRO.
- (b) The complainant can contact the CRAO for the purposes of redressal of the complaint through the following modes:
 - (i) Email: Investors can send an email to ocmindiagift@oaktreecapital.co.in
 - (ii) Letter: Investors can write to the Manager with their Complaint at the registered office address as mentioned here:

ATTN: Chief Redressal Appellate Officer

Unit No.C_116, Plot T1&T4, Road 13, Block 11, SEZ GIFT, Gift City, Gandhi Nagar, Gujarat, 382355, India

- (c) The CRAO shall dispose the appeal within 60 (sixty) days.
- (d) The CRAO shall monitor pending or unresolved complaints and review them at regular intervals for ongoing improvement in service levels.

3. Complaint before the Authority:

- (a) If a complainant remains dissatisfied with the decision of the CRO and has exhausted the internal appellate mechanism provided by the Manager, the complainant may file a Complaint before the

IFSCA through an email to grievance-redressal@ifsc.gov.in preferably within 21 (twenty one) days of the decisions of the CRAO.

VI. Record Keeping

1. The Manager shall ensure that all records relating to handling of Complaints are maintained including:
 - (a) Complaints received and processed;
 - (b) All correspondence exchanged between the Manager and the complainant;
 - (c) All information and documents examined and relied upon by the Manager while processing the complaints;
 - (d) Outcome of the complaints;
 - (e) Reasons for rejection of complaints, if any;
 - (f) Timelines for processing of complaints; and
 - (g) Data of all complaints handled by the Manager.
2. Such records shall be maintained in electronic retrieval form for at least 6 (six) years from the date of disposal of the complaint.

VII. Reporting

The Manager shall file reports on handling of complaints in the form and manner as specified by the IFSCA from time to time. The Fund shall have a section with the heading 'Complaint Handling and Grievance Redressal' in its annual report, providing data of all complaints received, resolved, rejected and pending during the year in a tabular/ graphical format.

VIII. Review of Policy

The Manager may review and amend this Policy as required under Applicable Law or as it may deem necessary, in light of any changes in regulatory framework or for business and/or operational reasons.

Annexure A

Set out below are the funds for which this Policy has been adopted by the Manager:

1. India Opportunities XB IFSC Alternative Investment Fund I;
2. India Opportunities XB IFSC Alternative Investment Fund II;
3. India Opportunities XI IFSC Alternative Investment Fund I;
4. India Opportunities XI IFSC Alternative Investment Fund II; and
5. India Opportunities XII IFSC Alternative Investment Fund.