Complaint Handling and Grievance Redressal Policy

Globridge Capital IFSC Private Limited Fund Management Entity registered with IFSCA (Registration No. FDM2026FUM1106) Registered Office: Unit 640, Signature Hiranandani, Block-13, Zone-1, GIFT SEZ, GIFT City, Gandhinagar, Gujarat 382355

Item	Detail
Policy owner	Compliance Officer
Version	1.0
Approved by	Board of Directors, on 11 September 2026
Effective from	1 October 2026
Review cycle	At least annually, and on any change in IFSCA requirements

1. Purpose and Regulatory Basis

Globridge Capital IFSC Private Limited ("Globridge", "the FME", "we") manages funds from the International Financial Services Centre (IFSC) at GIFT City, including the Leader Angel IFSC Fund. We want every investor's concern to be heard fairly, handled promptly and resolved transparently.

This Policy is framed under, and should be read with:

- the IFSCA (Fund Management) Regulations, 2025;
- the IFSCA circular "Complaint Handling and Grievance Redressal by Regulated Entities in the IFSC" dated 2 December 2024 (F. No. IFSCA-LPRA/3/2024-Legal and Regulatory Affairs) (the "IFSCA Circular"); and
- the IFSCA circular dated 26 August 2026 (F. No. IFSCA-SOF/2/2026-Capital Markets) on website disclosures by Fund Management Entities, effective 1 December 2026.

Where any provision of this Policy conflicts with an applicable Act, Rule, Regulation or IFSCA circular, the latter prevails.

2. Scope

This Policy applies to complaints made by investors, and persons seeking to invest, in any fund, scheme or service managed or offered by Globridge from the IFSC (together, "Investors"), other than Globridge's own group entities. It covers complaints about the products and services we provide, including onboarding, communications, reporting, fee charging, capital calls and distributions, and conduct of our personnel and our authorised distributors.

Although the detailed timelines in the IFSCA Circular are mandatory only for entities dealing with retail consumers, Globridge applies the same timelines and appeal mechanism to all Investors.

3. Definitions

- **Complaint**: a written expression of dissatisfaction by an Investor about a financial product or service provided by Globridge in the IFSC, which is complete, specific and, where relevant, supported by documents.
- **Complaint Redressal Officer (CRO)**: the employee of Globridge responsible for handling complaints.
- **Complaint Redressal Appellate Officer (CRAO)**: a senior person designated to hear appeals against the CRO's decision, at the level of or one level below Key Managerial Personnel.
- **Working day**: any day other than a Saturday, Sunday or public holiday in Gujarat.

4. What Is Not a Complaint

In line with Schedule I of the IFSCA Circular, the following are not treated as complaints under this Policy (we will still respond courteously and, where possible, help):

1. Anonymous complaints, except whistleblower complaints.
2. Incomplete or non-specific complaints.
3. Allegations without supporting documents.
4. Suggestions, or requests for guidance or explanation.
5. Matters not relating to financial products or services provided by Globridge.
6. Complaints about any unregistered or unregulated activity.
7. Requests for information or clarification about our products or services.

5. Guiding Principles

- Fair, impartial and professional handling of every complaint.
- Transparency: Investors are told what is happening and why a decision was made.
- Timeliness: complaints are resolved within the timelines in Section 7.
- Independence: an officer who was involved in the transaction complained about does not decide the complaint.
- No retaliation: raising a complaint will never adversely affect an Investor's relationship with Globridge.
- Confidentiality: complaint details are shared only with those who need them to resolve it, or as required by law or the regulator.

6. How to Lodge a Complaint

Write to the Complaint Redressal Officer by email, or by post to our registered office, giving:

1. Name, contact details and Investor/folio reference;
2. The fund or service concerned;
3. A clear description of the issue, with dates and amounts;
4. Copies of supporting documents; and
5. The outcome sought.

Complaint Redressal Officer Mrs. Shilpa J G Email: admin@globridgecapitalifsc.com Telephone: +91 90712 34521

For general enquiries, telephone +91 85490 09099. Enquiries that are not complaints are handled by the Investor Relations desk.

7. Handling Procedure and Timelines

Stage	Timeline
Assessment of the complaint on merits by the CRO	On receipt
Written acknowledgement of acceptance	Within 3 working days of receipt
Written intimation of non-acceptance, with reasons	Within 5 working days of receipt

Stage	Timeline
Disposal (resolution or rejection)	Preferably within 15 days, and ordinarily not later than 30 days from acceptance
Appeal to the CRAO, by the Investor	Preferably within 21 days of receiving the CRO's decision
Disposal of appeal by the CRAO	Within 30 days of the appeal
Complaint to IFSCA, after the appeal route is exhausted	Preferably within 21 days of receiving the decision

In handling a complaint, Globridge will:

1. Examine it fairly, transparently and impartially, and give the CRO enough authority, or access to officials with authority, to resolve it.
2. Ask the Investor for additional information or documents where needed.
3. Where the CRO was or is involved in the transaction complained about, assign the complaint to another officer designated by the Board.
4. Communicate the outcome in writing. A rejection will always state the reasons in writing.

8. Appeal to the Complaint Redressal Appellate Officer

If the Investor is not satisfied with the resolution, or the complaint has been rejected, the Investor may appeal to the CRAO, preferably within 21 days of receiving the CRO's decision. The CRAO will review the matter afresh and dispose of the appeal within 30 days.

Complaint Redressal Appellate Officer Mr. Sahil Balani, Principal Officer Email: sahil@globridgecapitalifsc.com Telephone: +91 88795 35759

9. Complaint to IFSCA

If the Investor remains dissatisfied after the appeal, the Investor may file a complaint with the International Financial Services Centres Authority by email to **grievance-redressal@ifsca.gov.in**, preferably within 21 days of receiving the decision from Globridge.

10. Escalation Matrix

Level	Contact	Role	When to approach
Level 1	Investor Relations Desk, +91 85490 09099	First point of contact for queries and concerns	Any concern, query or service request
Level 2	Mrs. Shilpa J G, Complaint Redressal Officer, admin@globridgecapitalifsc.com, +91 90712 34521	Formal complaint handling	If Level 1 does not resolve the matter, or for any formal complaint
Level 3	Mr. Sahil Balani, Principal Officer (CRAO), sahil@globridgecapitalifsc.com, +91 88795 35759	Appeal	If dissatisfied with the CRO's decision, or no decision within the stated time
Regulator	IFSCA, grievance-redressal@ifsca.gov.in	Complaint before the Authority	After the Level 3 appeal is exhausted

11. Roles and Responsibilities

- **Board of Directors**: approves this Policy and any amendment, and reviews complaint data and trends at least annually.
- **Compliance Officer**: ensures complaints are handled and disposed of in accordance with IFSCA requirements, monitors timelines, and oversees records and reporting. Responsibilities of the Principal Officer under the Fund Management Regulations continue to apply.
- **Complaint Redressal Officer**: receives, assesses, investigates and resolves complaints within the stated timelines.
- **Complaint Redressal Appellate Officer**: decides appeals and periodically reviews grievance trends and reports them to the Board.
- **All personnel and authorised distributors**: forward any complaint received to the CRO without delay, and cooperate in its resolution.

12. Records

Globridge will maintain, in electronic retrievable form: complaints received and processed; all correspondence with complainants; documents examined and relied upon; outcomes; reasons for any rejection; timelines of processing; and data of all complaints handled. Records are kept for the period mandated by IFSCA under the applicable regulations, and in any case for at least six years from the date of disposal of the complaint. Where litigation or legal proceedings relating to a complaint are pending, records are kept for the applicable period after their final disposal.

13. Reporting and Public Disclosure

- This Policy, and the names and contact details of the CRO and CRAO, are displayed prominently on the Globridge website under the heading **"Complaint Handling and Grievance Redressal"**.
- The status of complaints received, disposed of and pending is published on the website and updated every quarter, in the format below.
- Complaint data (received, resolved, rejected and pending during the year) is disclosed annually under the same heading, and in any annual report where one is required.
- Reports on complaint handling are filed with IFSCA in the form and manner it specifies from time to time.

Quarterly status of investor complaints

Quarter	Pending at start	Received	Resolved	Rejected	Pending at end	Average days to dispose
[quarter ended]						

14. Review and Amendment

The Compliance Officer reviews this Policy at least once a year and whenever IFSCA issues a new or revised requirement. Amendments take effect only after approval by the Board, and the revised Policy is promptly published on the website, replacing the earlier version.