

## GRIEVANCE REDRESSAL POLICY

### 1. Background

- 1.1 Sorigin Green Solutions Fund is a Category II Alternative Investment Fund (the “**Fund**”), registered with the Securities and Exchange Board of India (“**SEBI**”) under the Securities and Exchange Board of India (Alternative Investment Funds) Regulations, 2012, as amended from time to time (the “**Regulations**”).
- 1.2 Sorigin Investment Management Services Private Limited (“**Sorigin**” or the “**Investment Manager**”), a company incorporated under the provisions of the Companies Act, 2013, is engaged in the business of providing investment management and advisory services and, pursuant to the investment management agreement dated 17<sup>th</sup> October 2024, has been appointed as the investment manager of the Fund.
- 1.3 Sorigin recognizes its fiduciary duty as an investment manager to act in the best interests of the Fund’s contributors (“**Investors**”). In line with this responsibility, and pursuant to Regulation 24A read with SEBI Circular No. SEBI/HO/IMD/IMD-I/DOF9/P/CIR/2021/682 dated December 10, 2021, read with SEBI Circular No. SEBI/HO/OIAE/IGRD/CIR/P/2023/156, dated September 20, 2023, Sorigin has formulated this Policy to ensure the timely and effective resolution of Investor grievances.

### 2. Objective and Scope

- 2.1 The purpose of this Grievance Redressal Policy (the “**Policy**”) is to establish a clear framework for receiving, handling, and responding to grievances reported by the Investors. It aims to ensure that concerns are addressed in a fair, transparent, and timely manner, in line with regulatory expectations and Sorigin’s commitment to Investor satisfaction.
- 2.2 The broad objectives of this Policy are as follows:
- a) To provide fair, consistent, and unbiased treatment to Investors at all times.
  - b) To ensure that all grievances raised by Investors are addressed with courtesy, professionalism, and within the stipulated timelines.
  - c) To establish a structured framework for prompt and equitable resolution of grievances.
  - d) To foster Investor trust and enhance overall satisfaction through effective grievance handling mechanisms.
- 2.3 For the purposes of this Policy:
- 2.3.1 “**Grievance**” shall mean and include any communication or statement (whether delivered in writing, orally or electronically) that conveys dissatisfaction

regarding the conduct, act of omission or commission, or deficiency in service by Sorigin. Provided, however, it shall not include:

- a) communications that merely offer suggestions;
- b) communications seeking guidance, information, or clarification;
- c) complaints that are sub judice (i.e., matters currently under consideration by a court of law or quasi-judicial authority).

2.3.2 Sorigin has designated one of its personnel as the Investor Relations Officer who shall seek to attend and address any Grievance in the manner described hereunder.

2.3.3 Sorigin shall also ensure that such official is vested with the necessary authority and independence to handle Grievances.

### **3. Grievance Redressal Mechanism**

3.1 Manner of Registration: An Investor may register a Grievance in the following manner:

3.1.1 Registration of Grievance with Sorigin:

- a) An Investor may register its Grievance by directly communicating it to the Investor Relations Officer either at the registered email address or in physical form at:

**Investor Relations Officer:**

Name: **Shyam Shirke**

Email: [contact.sims@sorigin.co](mailto:contact.sims@sorigin.co)

Contact No.:

Address: **AP81, B Wing, 17<sup>th</sup> Floor, Koregaon Park Annexe, Mundhwa, Pune, Maharashtra 411036**

The Investors can also call the Investor helpline number or send an email to the above-mentioned email ID on any business day between 9.00 am to 6.00 pm to register their queries/complaints.

- b) Any change in the details of the Investor Relations Officer shall be promptly notified by Sorigin to the Investors.

3.1.2 Registration on the SEBI Complaints Redress System (SCORES) Platform:

- a) In accordance with the requirements prescribed by the SEBI, Sorigin, as the Investment Manager to the Fund, is registered on the SEBI Complaints Redress System (SCORES) platform.
- b) SCORES is an online platform established by SEBI to facilitate investors in lodging their Grievances in a centralized and transparent manner. Investors may register their Grievances on the SCORES platform, and the Investor Relations Officer shall ensure that all Grievances received on the SCORES

platform are addressed promptly, effectively, and in compliance with timelines and procedures prescribed by SEBI.

- c) The SCORES platform can be accessed at: <https://scores.sebi.gov.in>

### 3.1.3 Online Resolution of Disputes through SMART ODR Portal:

- a) The Investor shall first take up their grievance with Sorigin by lodging a complaint directly with Sorigin as mentioned in clause 3.1.1 above. If the grievance is not redressed satisfactorily, the Investor may, in accordance with clause 3.1.2 above, escalate the same through the SCORES platform.
- b) After exhausting these options for resolution of the grievance, if the Investor is still not satisfied with the outcome, they can initiate dispute resolution through the Online Dispute Resolution Mechanism (“ODR”) offered by SEBI through the Smart ODR Portal on the website <https://smartodr.in/login>.
- c) Sorigin may also initiate dispute resolution through the ODR Portal after having given due notice of at least 15 calendar days to the Investor for the resolution of the dispute, which has not been satisfactorily resolved between the Investor and Sorigin.
- d) The dispute resolution through the ODR Portal can be initiated when the Grievance is not under consideration in terms of the clause 3.1.1 and clause 3.1.2 above or SCOREs guidelines as applicable or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law (including when moratorium under the Insolvency and Bankruptcy Code is in operation due to the insolvency process or if liquidation or winding up process has been commenced against Sorigin.
- e) Utilisation of the ODR mechanism is optional and may be undertaken either in addition to, or independent of, the grievance redressal process specified under Clauses 3.1.1 and 3.1.2 above.
- f) The dispute resolution through the ODR Portal can be initiated within the applicable law of limitation. (starting from the date when the issue arose/occurred that has resulted in the complaint/date of the last transaction or the date of the disputed transaction, whichever is later).

### 3.1.4 Timeline for Resolution:

- a) Any Grievance registered by an Investor (in the manner provided under clause 3.1.1 and 3.1.2 above) shall be resolved by the Investor Relations Officer promptly, but no later than 21 (twenty-one) calendar days of its receipt. In cases where the Grievance involves allegations of fraud or other

serious allegations of a similar nature, which require additional time for investigation and resolution, the same shall be duly acknowledged by Sorigin, and the revised turnaround time shall be communicated to the Investor promptly.

- b) In case the Investor Relations Officer has rejected the Grievance, or the Investor has not received any communication from the Investor Relations Officer or is not satisfied with the reply received or the redressal by the Investor Relations Officer, the Investor may lodge their Grievance on the SCORES platform, within a period of one year from the date of occurrence of the cause of action, i.e., the rejection of the Grievance or non-receipt of any communication or reply/redressal received being not satisfactory.
- c) In the event the Investor is not satisfied with the resolution provided by the Investor Relations Officer as per Clause 3.1.1 and 3.1.2 above, within the timelines specified above, the Investor may, at its discretion, submit such dispute for ODR in accordance with clause 3.1.3 above. It is clarified that the ODR mechanism made available through the ODR Portal is a distinct and voluntary facility provided by SEBI. The ODR mechanism operates independently and does not constitute a continuation or escalation of the grievance redressal process under SCORES.
- d) If the Investor is not satisfied with the resolution provided by the Investor Relations Officer, the Investor may submit such dispute to arbitration in accordance with clause 6 below as an alternate and independent mode of resolution.

#### **4. Resolution of Grievances**

- 4.1 A Grievance shall be considered to be “resolved” and closed upon the occurrence of any of the following events:
  - 4.1.1 A comprehensive, final response has been provided to the complainant addressing all concerns raised, and no further communication has been received from the complainant;
  - 4.1.2 The complainant has expressly communicated satisfaction with the resolution provided; or
  - 4.1.3 In cases where Grievance has been registered on the SCORES platform and such Grievance is marked as resolved by SEBI or closed by the complainant on the platform.

#### **5. Display of Grievance Data and Maintenance of Records**

- 5.1 The details of the resolved Grievances shall be disclosed on Sorigin’s website on a monthly basis, no later than the 15<sup>th</sup> day of the following month, in the format specified under the Fund’s private placement memorandum dated [●].

- 5.2 Sorigin shall maintain proper records of all Grievances received, along with details of their resolution, including the name of the complainant, nature of the grievance, date of receipt, date of resolution, and manner of resolution. These records shall be preserved in a secure and retrievable manner and made available to SEBI or any other regulatory authority upon request.

**6. Dispute Resolution Mechanism:**

Notwithstanding anything to the contrary contained in this Policy, any dispute arising out of an unresolved Grievance shall be addressed in the following manner in the event Investor opts for dispute resolution through arbitration as set out in this clause:

- 6.1 The aggrieved Investor and Sorigin agree that the discussions shall be held in the spirit of resolution of the issues that have arisen between them with the intention of resolving the issues amicably at the earliest. If the aggrieved Investor is not satisfied with the outcome of the discussions, within 45 (forty-five) days from the receipt of the response, it shall resort to arbitration.
- 6.2 In the event of the failure to resolve such dispute in the manner provided above, the Parties shall be bound to submit all such disputes and differences to arbitration. The arbitration proceedings shall be held before 01 (one) arbitrator of exemplary qualifications and stature, who shall be selected jointly by the aggrieved Investor and Sorigin, or, if they cannot agree on the selection of the arbitrator, such arbitrator shall be selected in accordance with the provisions of the Arbitration and Conciliation Act, 1996. The arbitration proceedings shall in all be conducted in accordance with the provisions of the Arbitration and Conciliation Act, 1996.
- 6.2.1 The arbitrator shall be a person of professional repute who is not directly or indirectly connected with the aggrieved Investor and/or Sorigin and has prior experience as an arbitrator.
- 6.2.2 The place of arbitration shall be Mumbai. The language to be used in the arbitration proceedings shall be English.

**7. Review of the Policy**

This Policy shall be reviewed and updated once every year, or as and when required, based on changes in regulatory requirements