

## **Investor Charter and Disclosure of Complaints**

### A. VISION AND MISSION STATEMENT:

#### **Vision**

To develop the AIF industry on professional and ethical lines and maintain high standards of governance and transparency.

#### **Mission**

- Maintain high professional and ethical standards within the AIF industry.
- Comply with all applicable regulations and co-operate with the regulators in all aspects of the AIF activity.
- Act in a fiduciary capacity towards the Investors.

### B. DETAILS OF BUSINESS TRANSACTED BY THE ORGANIZATION WITH RESPECT TO THE INVESTORS:

- To raise capital from domestic and global investors.
- To invest in portfolio companies in accordance with investment strategy stated in Scheme Documents, with an objective to generate positive returns for the stakeholders including investors.
- To distribute returns to the investors as per the Scheme Documents.

### C. DETAILS OF SERVICES PROVIDED TO INVESTORS:

#### **1. On-boarding of investors**

- 1.1. Sharing of the Private Placement Memorandum (PPM).
- 1.2. Account opening with the AIF:
  - Completing KYC of Investors and registration of KYC with KRAs.
  - Sharing of copies of Scheme Documents with investors.
  - Entering into contribution agreement with investor.

#### **2. Obtaining investor consent for material changes to fund structure**

- 2.1 Change in the sponsors or the investment manager of the AIF.
- 2.2 Change in control of the sponsors or the investment manager of the AIF.
- 2.3 Material changes to terms of PPM
  - Term of fund.
  - Investment strategy.
  - Increase in fees and charges.
- 2.4 Winding up of fund prior to expiry of tenure.

#### **3. Dissemination of financial information of fund.**

- 3.1 net asset value of fund.

- 3.2 Financial information of investee companies.
- 3.3 Information on performance of fund.

**4. Disclosures with respect to material risks associated with the fund and its portfolio investments.**

- 4.1 Any inquiries/ legal actions by legal or regulatory bodies in any jurisdiction.
- 4.2 Any material liability arising during the tenure of the fund.
- 4.3 Any breach of a provision of the PPM or any other agreement made with the investor or any other Scheme Documents.
- 4.4 Intimation regarding any conflict of interest.
- 4.5 Risks associated with the portfolio, such as concentration risk, foreign exchange risk, leverage risk, realization risk, strategy risk, reputation risk, extra-financial risks such as social and corporate governance risks etc. at fund and investee company level.

**5. Intimation of any non-material changes in the operations of the fund.**

- 5.1 Non-material changes such as
  - Bank account details
  - Address of the AIF or its investment manager or sponsors
  - Contact details such as email-id, contact number, etc. of the AIF or its investment manager or sponsors

**6. Grievance redressal**

Redressal of Investor complaints received directly from investors and/or from SEBI / SCORES.

**D. TIMELINES OF THE ACTIVITY/SERVICES PROVIDED TO INVESTORS:**

Sr. No.	Description of activity/services provided by AIFs to its Investors	Timeline for completion of activity
<b>1.</b>	<b>Valuation related disclosures:</b>	
a.	Valuation of investment by Category II AIF	At least once every six months. Can be extended to once a year with approval of 75% of its investors by value of investment.
b.	Disclosure of financial information of investee companies	Category II AIF - within 180 days from the year end or earlier as per the Scheme Documents.
<b>2.</b>	<b>Transparency related disclosures:</b>	
a.	Disclosure of financial information of investee companies	Category II AIF - within
b.	Disclosure of material risks:	

Sr. No.	Description of activity/services provided by AIFs to its Investors	Timeline for completion of activity
	concentration risk, foreign exchange risk at Fund level and leverage risk, realization risk, strategy risk, reputation risk at investee company level, extra-financial risks such as social and corporate governance risks etc. at fund and investee company level	180 days from the year end or earlier as per the Scheme Documents.
c.	Financial, risk management, operational, portfolio, and transactional information regarding fund investments	To be disclosed periodically to the investors as per Scheme Document
d.	Any fees ascribed to the investment manager or sponsors; and any fees charged to the AIF or any investee company	
e.	Any inquiries/ legal actions by legal or regulatory bodies in any jurisdiction	As and when occurred
f.	Any material liability arising during the AIF's tenure	
g.	Any breach of a provision of the PPM or agreement made with the investor or any other Scheme Documents	
h.	Intimation regarding conflict of interest in any transaction	As and when they arise or seem likely to arise
i.	Any change in terms of the PPM / Scheme Documents	On consolidated basis within one month of end of each financial year
<b>3.</b>	<b>Complaint handling related services:</b>	
a.	Response to complaint received from investors	Within 30 days from the date of receipt of complaint
b.	Redressal of Investor complaint received from SEBI/ SCORES	Within 30 days from the date of receipt of complaint

#### E. DETAILS OF GRIEVANCE REDRESSAL MECHANISM AND HOW TO ACCESS IT.

1. AIFs are required to redress all investor complaints in timely manner.
2. An AIF, by itself or through the investment manager or sponsors have laid down the procedure for resolution of disputes between the investors and AIF or investment manager or sponsors through arbitration or any such mechanism as mutually decided between the investors and the AIF.
3. The complaints shall reach the AIF Compliance team to the prescribed email ID: [aifcompliance@neoassetmanagement.com](mailto:aifcompliance@neoassetmanagement.com) that would be initially acknowledged in 24 hours and subsequently depending on the nature of complaint will be responded by the Grievance Officer
4. On receiving the response the investors could raise their further concerns and escalate the complaint to the Principal / Compliance officer for effective resolution
5. On satisfaction of the response from the Grievance redressal team, the mail shall be acknowledged from the investors of resolution for reporting purposes

6. Investors can also approach SEBI for redressal of their complaints through SEBI SCORES platform in case of escalation. On receipt of complaints, SEBI takes up the matter with the concerned AIF.
7. 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.

#### F. RESPONSIBILITIES OF INVESTORS

##### 1. **Responsibility to inform and educate yourself**

- 1.1. Read thoroughly all Scheme Documents including PPM, Contribution Agreement, sales literature, newsletters and understand the product.
- 1.2. Carefully consider all investment risks, fees, and/or other factors detailed in these documents.
- 1.3. Ensure and make certain that the proposed investment in the fund meets your investment objective and is in alignment with your risk appetite.
- 1.4. Review your portfolio holdings, account statements and transaction confirmation on regular basis to ensure that you are aware of all transactions and securities where you are invested.

##### 2. **Responsibility to timely update your KYC and information with the intermediary**

- 2.1. Provide complete and accurate information in your KYC documents, including financial/ income status.
- 2.2. Timely updation of KYC information.

##### 3. **Responsibility to abide by the contribution agreement.**

- 3.1. The investor needs to read carefully and understand the agreement that he/she is entering into with the AIF and abide by the terms thereof.
- 3.2. The investor should be aware that investment terms are not guarantee of future performance or returns of the fund/ scheme.

##### 4. **Responsibility to use right financial intermediaries, consultants and advisors.**

- 4.1. Carefully consider validity and reliability of investment information obtained from all sources, especially unsolicited information obtained over the Internet.

##### 5. **Responsibility to maintain confidentiality of information.**

- 5.1. Investors shall not disclose any material non-public information that is received by virtue of being investors of the fund, except as may be guided by the terms of the Scheme Documents.

Complaint Data for the Fund managed by Neo Asset Management P Limited

**Data for the month ending – March 31, 2025**

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

^ Average Resolution time is the sum total of time taken to resolve each complaint in days, in the current month divided by total number of complaints resolved in the current month

**Trend of monthly disposal of complaints**

Sr. No.	Financial Years	Carried forward from previous month	Received	Resolved*	Pending#
1	FY 2022-23	NIL	NIL	NIL	NIL
2	FY 2023-24	NIL	NIL	NIL	NIL
3	FY 2024-25	NIL	NIL	NIL	NIL
	<b><u>AIF Category II Funds Reg No. IN/AIF2/22-23/1042</u></b>				
	Neo Special Credit Opportunities Fund	NIL	NIL	NIL	NIL
	Neo Infra Income Opportunities Fund	NIL	NIL	NIL	NIL
	Neo Radiance Fund – Series 1	NIL	NIL	NIL	NIL
	Neo Income Plus Fund	NIL	NIL	NIL	NIL
	Neo Prime Fund	NIL	NIL	NIL	NIL

**NEO ASSET MANAGEMENT PRIVATE LIMITED**

Corporate Identity Number: U67100MH2021PTC372701

Registered Office Address: B-903 Marathon Futorex | NM Joshi Marg | Lower Parel | Mumbai 400013

	<b>Grand Total</b>	NIL	NIL	NIL	NIL
	<b><u>AIF Category III Funds Reg No. IN/AIF3/21-22/1001</u></b>				
	Neo Treasury Plus Fund	NIL	NIL	NIL	NIL
	Neo Dynamic Strategy Fund	NIL	NIL	NIL	NIL
	<b>Grand Total</b>	NIL	NIL	NIL	NIL
	<b><u>IN/AIF2/24-25/1656</u></b>				
	Neo Special Credit Opportunities Fund II	NIL	NIL	NIL	NIL
	<b><u>IN/AIF2/24-25/1770</u></b>				
	Neo Private Equity Alternative Investment Trust	NIL	NIL	NIL	NIL

**Trend of monthly disposal of complaints – FME entity in IFSCA schemes registered under FME Registration No. IFSCA/FME/II/2023-24/084**

<b>Sr. No.</b>	<b>Financial Years</b>	<b>Carried forward from previous month</b>	<b>Received</b>	<b>Resolved*</b>	<b>Pending#</b>
1	FY 2022-23	NIL	NIL	NIL	NIL
2	FY 2023-24	NIL	NIL	NIL	NIL
3	FY 2024-25	NIL	NIL	NIL	NIL
	<b><u>AIF Category III Funds in IFSCA</u></b>				
	Neo Special Credit Opportunities Fund I – Registration No. IFSC/AIF3/2024-25/0126	NIL	NIL	NIL	NIL
	Neo Infra Income Opportunities Fund I – Registration No. IFSC/AIF3/2024-25/0103	NIL	NIL	NIL	NIL
	Neo Global Multi-Asset Balanced Fund – Registration	NIL	NIL	NIL	NIL

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No. IFSC/AIF3/2024- 25/101				
<b>Grand Total</b>	<b>NIL</b>	<b>NIL</b>	<b>NIL</b>	<b>NIL</b>

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