

THE GOLDEN BIRD INVESTMENT TRUST

(SEBI Registration No: IN/AIF3/24-25/1743)

ALPHA NIVESH PRIVATE LIMITED

(Investment Manager)

*Under The SEBI (Alternative Investment Funds) Regulations, 2012
("AIF Regulations")*

GRIEVANCE REDRESSAL POLICY

Document Control	
Title	Grievance Redressal Policy
Policy Owner	Compliance Team
Approved by	Board of Directors dated 23rd April 2026
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Version/ Annual Review Details

Sr. No.	Details of Changes	Date of creation / Change	Author	Version Number	Approved By
1	1 st Policy	06 th June 2025	Compliance Team	V.1	Board of Directors
<u>2</u>	2 nd Policy	23 rd April 2026	Compliance Team	V.2	Board of Directors

1. Background

Alpha Nivesh Private Limited ('Green' or 'Investment Manager') acts as the Investment Manager the Golden Bird AIF Trust (the 'Fund' or 'AIF') which has been established as a contributory determinate trust under the provisions of the Indian Trusts Act, 1882 ("Trusts Act") pursuant to the Indenture of the Fund. MITCON Credentia Trusteeship Services Limited is the Trustee of the Fund. The Fund is registered with the Securities and Exchange Board of India ("SEBI") as a Category III Alternative Investment Fund ("Cat III AIF") under the SEBI (Alternative Investment Funds) Regulations, 2012 ("AIF Regulations") vide registration number IN/AIF3/24-25/1743 and operating through two schemes namely Golden Bird Investment Trust 1 and India registered as SEBI CAT III AIF.

The Fund believes that Investor service is a vital element for sustained business growth and for better corporate governance. The Fund's approach is to treat and service all the investors consistently and fairly. The Fund endeavours to address all grievances/ complaints, in a reasonable time and satisfactory manner. Investor grievances/ complaints constitute an important voice of the Investor and thus a structured grievance redressal framework is important.

The AIF Regulations mandate the Investment Manager to address all investor grievances and prescribes an AIF, by itself or through the Manager or Sponsor, to lay down the procedure for resolution of disputes between the investors, AIF, Manager or Sponsor through arbitration or any such mechanism as mutually decided between the investors and the AIF.

In compliance with the above requirements, the Fund has framed the Investor Grievance Redressal Policy (the 'Policy') to lay down the grievance redressal framework and the dispute resolution mechanism it will follow in the event an investor raises a grievance concerning the activities of the Funds. The Policy will be read in accordance with the provisions of the Contribution Agreements (as entered and will be entered from time to time and to the extent relevant in the current context) and the latter will prevail in case of any differences.

The Investment Manager shall be deemed to have adopted this Policy in respect of each scheme of the Fund severally and not jointly. No rights, responsibilities or liabilities of any scheme of the Fund shall be attributed to any other scheme of the Fund. This Policy shall be deemed to be a separate Policy for each scheme of the Fund, and each reference herein to "Fund" shall be deemed to be a reference to each such scheme severally and not jointly. The term "Fund" is used collectively herein for the sake of convenience only and shall in no way be deemed to impose or create any joint duties, obligations or liabilities among the schemes of the Fund.

2. Objective

The objective of this Policy is to provide for efficient and effective grievance redressal mechanism for investors. This Policy has been formulated considering the following:

- (a) Investors are treated fairly and without discrimination;
- (b) Complaints and grievances are handled efficiently and within prescribed timelines;
- (c) Confidentiality of investor is always maintained.
- (d) Investors are informed of avenues to escalate their complaints/grievances; and
- (e) The employees work in good faith and without prejudice, towards the interests of the

Investors.

3. Scope and Purpose

A grievance, as defined in this policy, refers to a written or verbal expression of dissatisfaction from an investor regarding the operation of the Scheme or the conduct of its employees. This may involve potential harm or wrongdoing to the investor or a violation of SEBI guidelines or other applicable laws/regulations. Grievances may include issues such as failure to disclose conflicts of interest, misrepresentation, or concerns related to the processing of transactions like drawdowns or the distribution of units. However, general feedback, queries, or requests for clarifications are not considered grievances.

If grievances are not addressed promptly, they could harm the reputation and functioning of the Fund and Scheme. This policy provides a framework for the Investment Manager to ensure that investor grievances are handled in an efficient, timely, and appropriate manner. The goal is to ensure that no grievance remains unresolved or pending for an extended period, and that all grievances are redressed effectively.

4. Key obligations of the Investment Manager and Investor Relation Officer/Grievance Redressal Officer:

The Investment Manager and Investor relations officer/Grievance Redressal Officer will ensure adherence to the following principles:

- (a) Investors are treated fairly, reasonably, justly, and in a time-bound manner always.
- (b) Investor confidentiality and privacy is always maintained through a secure environment.
- (c) Investors are informed about the status or resolution through appropriate channels.
- (d) Adequate records of grievances and resolutions are maintained

5. Creating Awareness on Grievance Redressal Mechanism

The Investment Manager is required to create awareness amongst the investors regarding the following:

- (a) Process for filing a complaint; and
- (b) Process for escalation of complaint in case of delayed or no response.

6. Grievance Redressal Framework

The Investment Manager will inform the Investors regarding the following options available for grievance redressal:

- a) Registration of investor's grievance with the Fund/Scheme – Any grievances received from the investors will be directed and acknowledged by the investor relation officer/ Grievance Redressal Officer. The Investor Relation Officer/ Grievance Redressal Officer will endeavor to resolve the complaint within a reasonable time and keep the investors duly

informed of the status and actions taken.

- b) Registration of investor's grievance on the SEBI Complaints Redress System (SCORES) website – Without prejudice to anything stated above, the investor may further register their grievance/complaint through SCORES (SEBI Complaints Redress System) available at <http://scores.gov.in>, post which SEBI may forward the complaint to the Investment Manager and the Investment Manager will suitably address the same. The Trust's/Fund's SCORES registration number is AIFN0029.
- c) Upon receiving complaints through the SCORES platform, the Investment Manager will ensure its resolution within twenty-one days of submission of such complaints. During such period the investor will be kept duly informed of the status and actions taken.
- d) Dispute resolution mechanism - Any dispute unresolved by the above internal grievance redressal mechanism of the Investment Manager, may be submitted to arbitration under the Arbitration and Conciliation Act, 1996. The arbitration shall be held in accordance with the terms of the Contribution Agreement.

The Dispute Resolution Mechanism between the Investment Manager and/ or the Trustee Company and the Investors of the Fund will be as specified in the relevant Fund documents and will be complied with at all times.

7. Resolution Process

It may be noted that only the grievances received in written form will be considered under the grievance redressal mechanism. The Investor shall address the complaint in the manner provided in **Annexure I** to this Policy.

The Investor Relation Officer of the Investment Manager is designated as Grievance Redressal Officer under this Policy.

8. Changes to Policy

A review of this Policy would be carried out on an annual basis. Any material changes to this Policy that results in or could likely result in the obligations of the Investment Manager under this Policy, being diluted or becoming redundant, whether in letter or otherwise, shall be approved by the board of the Investment Manager ("Board"). An interim review can also be carried out to accommodate substantial changes, if any, on the regulatory and operating front by the Investor Relation Officer of the Trust/Fund.

The Policy should be placed before the management and if any changes in the policy are warranted, the revised policy should be placed before the management for review and approval. Views of concerned Business Heads and Chief of Internal Audit, if any, may be taken into account where the management finds it necessary. The Policy shall be reviewed at least annually by the

Compliance Officer and placed before the Board of Directors of the Investment Manager for noting/approval, wherever required.

Capitalised terms used herein but not defined, unless the context otherwise requires, shall have the meaning assigned to such terms in the private placement memorandum of the Fund.

9. Investor Charter and Complaint Disclosure

Investment Manager, in compliance with SEBI guidelines issued from time to time shall publish an Investor Charter on its website to ensure transparency and investor awareness. This Investor Charter will outline Fund and its scheme(s) vision, mission, services offered, and grievance redressal mechanisms for addressing investor complaints. To facilitate easy access, the Investor Charter shall be:

- Uploaded on Investment Manager's website with a direct link on the homepage.
- Displayed prominently at its office premises.
- Provided to clients as part of the account opening kit.
- Shared through emails or letters with investors.

Additionally, Investment Manager shall disclose details of investor complaints received and their resolution status on its website by the 7th of each month, as per the SEBI-prescribed format.

10. Review and Amendment

The Trust/Fund shall reserve the right to review and make amendment to the Policy from time to time as it deems fit in accordance with the applicable laws, rules and regulations for the time being in force. In the event of any conflict between the provisions of this Policy and the Act or Regulations or Rules or any other statutory enactments, the provisions of such Act or Regulations or Rules or statutory enactments shall prevail over this Policy. An interim review and amendment can also be carried out to accommodate minor changes, if any, on regulatory and operating front by the Compliance Officer of the Trust/Fund.

11. Maintenance of Records

The Register of Complaint and Grievance shall be maintained and updated with details of complaints and its resolution thereof with time take for resolution. The soft copies / hard copies of the complaints received from the Investor shall be preserved by the Customer Services team for future reference if required. A detailed report of complaints received and resolved and reasons for delay if any for resolution will be recorded. The Register of Complaint and Grievance will be maintained for such period as prescribed by regulatory authority from time to time.

Annexure I

Resolution Process:

- a) An investor may submit a complaint or grievance by duly completing the 'Investor Grievance Redressal Form' in the form set out in Annexure II hereto, and submitting the same to:

Investor Relations Officer: Bhoomika Kaushik

Email: compliance@goldenbirdaif.com

Address: GREEN PORTFOLIO PVT LTD FARM NO. 5, 1645, KANAWANI VILLAGE, INDIRAPURAM, GHAZIABAD, UTTAR PRADESH 201014, INDIA

Investment Manager has designated dedicated email IDs for investor grievance redressal. Investors can send concerns/complaints through email at compliance@goldenbirdaif.com

If the investor is not satisfied with the resolution provided, he/she/they may also consult the Director/Partner of Investment Manager, whose details are mentioned below:

Investment Manager- Alpha Nivesh Private Limited

Escalation Email: info@goldenbirdaif.com

Address: FARM NO. 5, 1645, KANAWANI VILLAGE, INDIRAPURAM, GHAZIABAD, UTTAR PRADESH 201014

In all cases, the Investment Manager shall redress the grievance or provide a requisite response within 21 calendar days from the date of receipt of the grievance.

- b) In case the Investment Manager has rejected the Complaint or the Investor has not received any communication from the Fund or is not satisfied with the reply received or the redressal by the Fund/Investment Manager, the Investor may file their complaint in SCORES 2.0 portal of SEBI i.e., <https://scores.sebi.gov.in/scores-home>.
- c) The Investor may lodge the Complaint against the Fund on SCORES 2.0 Portal within a period of one year from the date of occurrence of the cause of action i.e., rejection of complaint or non-receipt of any communication or reply/redressal received being not satisfactory.
- d) The investment Manager shall endeavour resolve the complaint and upload the Action Taken Report ("ATR") on SCORES 2.0 within 21 calendar days of receipt of such Complaint.

In case the Investor is not satisfied with the resolution provided, the Investor may request for a review of the resolution provided by the entity within 15 calendar days from the date of the ATR by the Investment Manager. In case of review, SEBI shall take cognizance of the complaint through SCORES 2.0 and seek clarifications from the Investment Manager. The Investment

Manager shall provide clarification to SEBI, wherever sought and within such timeline as specified. The review Complaint shall be treated as 'resolved' or 'disposed' or 'closed' only when SEBI 'disposes' or 'closes' the Complaint in SCORES 2.0. At any stage or in case the Investor is not satisfied with the resolution provided from aforesaid method or in cases where the issues raised require adjudication on any third party rights, on questions of law or fact or which is in the nature of a lawsuit between parties, Investor will have an option to refer the complaint to ODR (Online Dispute Resolution) on <https://smartodr.in/login>. Once the Complaint has been referred to ODR, the same shall be treated as disposed of in SCORES 2.0.

Process for filing complaints through the SCORES platform

The Investor needs to register on the SEBI SCORES 2.0 portal at <https://scores.sebi.gov.in/scores-home> by clicking on "Sign Up" and selecting the category as "Investor". Details like Name of the Investor, Permanent Account Number (PAN), contact details, email-id, etc. are required at the time of registration on the Scores 2.0 Portal. Upon successful registration, a unique user id and a password shall be generated and communicated through an acknowledgement email to the Investor. The Investor may then proceed to submit a complaint or grievance directly to The Golden Bird Investment Trust under the 'Category III Alternative Investment Fund' category.

Investors may contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on the SCORES 2.0 platform. The list of IAs is available at www.sebi.gov.in. Investors may also seek assistance in filing complaints on SCORES 2.0 from SEBI's toll free helpline number 1800 266 7575 or 1800 22 7575.

Important links:

SEBI SCORES 2.0	https://scores.sebi.gov.in/scores-home
SMART ODR	https://smartodr.in/login

Annexure II

INVESTOR GRIEVANCE FORM

Existing Investor- Individual Existing Investor- Non-Individual PERSONAL DETAILS:

*Name:

*PAN:

* DP & Client ID / Folio No (in case of existing investor):

CONTACT DETAILS:

*Address:

*Landline/Mobile:

*Email ID:

STATE YOUR GRIEVANCE

1000 words

*** *Mandatory Fields***

I, the complainant, do hereby acknowledge that all the information provided in this complaint form are true to my knowledge, belief and understanding and no part of it, intentionally or otherwise, has been concealed and/or misrepresented thereof.

[*End of the Form*]

Annexure III

Grievance Redressal Escalation Matrix

Level	Particulars	Designation	Contact Details	Timeline for Response / Resolution
Level 1	Initial complaint handling and resolution	Investor Relations Officer / Grievance Redressal Officer	Email: compliance@goldenbirdaif.com Contact No.: 9013518609	within [2] working days and resolution within 21 calendar days from date of receipt of the grievance.
Level 2	Escalation in case complaint remains unresolved or investor is dissatisfied with the response	Chief Investment Officer of the Investment Manager	Email: info@goldenbirdaif.com Contact No. 9310576792	Review and response within [7] working days. However, the resolution shall happen within 21 calendar days from date of receipt of the initial grievance (Level 1).
Level 3	Regulatory grievance redressal mechanism	SEBI Complaints Redress System ("SCORES 2.0")	SCORES 2.0 Portal	As per timelines prescribed by SEBI
Level 4	Online dispute resolution mechanism	SMART ODR Platform	SMART ODR Platform	As per applicable SEBI ODR framework
Level 5	Arbitration mechanism	Arbitration under Arbitration and Conciliation Act, 1996	As per the terms of the Contribution Agreement, Private Placement Memorandum and other constitutional documents of the Fund.	As per applicable arbitration proceedings