

A. K. ALTERNATIVE ASSET MANAGERS PRIVATE LIMITED
Grievance Redressal Policy
Document Name : AKAAMPL/CO/GRP

Grievance Redressal Policy (“The Policy”)

Version:3

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GRIEVANCE REDRESSAL POLICY

Structure of the Policy

This Policy is structured in two distinct parts to address grievance redressal requirements arising under different regulatory frameworks:

- **Part A** of this Policy sets out the grievance redressal mechanism for investors, formulated in accordance with the applicable provisions of the Securities and Exchange Board of India (Alternative Investment Funds) Regulations, 2012, and other applicable circulars issued thereunder.
- **Part B** of this Policy sets out the grievance redressal mechanism in relation to personal data, formulated in accordance with the provisions of the **Digital Personal Data Protection Act, 2023** and the rules made thereunder.

PART A – INVESTOR GRIEVANCE REDRESSAL POLICY

1. Background

A. K. Alternative Asset Managers Private Limited (hereinafter referred to as “**Investment Manager**”) is the sponsor to, and the Investment Manager of, the A K Alternative Investments Trust II (“**Fund**”), a Category II Alternative Investment Fund (“**AIF**”) registered with the Securities and Exchange Board of India (“**SEBI**”) under the Securities and Exchange Board of India (Alternative Investment Funds) Regulations, 2012 (“**AIF Regulations**”) (SEBI Registration No. IN/AIF2/23-24/1311). A K Securitization & Credit Opportunities Fund II (“**Scheme**”) is the first scheme of the Fund.

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 taking into account the following:

- (a) Investors are treated fairly at all times;
- (b) All complaints are dealt with efficiently and in a timely manner;
- (c) Confidentiality is maintained at all times;
- (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.

Further, as per the SEBI circular dated December 10, 2021 ("**SEBI Circular**"), the data on investor complaints received against the AIFs and each of their schemes and redressal status thereof, is required to be disclosed by all AIFs as per the specified format. While implementing this Policy, the Investment Manager shall also ensure compliance with the requirements of the SEBI Circular, including the requirement to maintain data on investor complaints as per the specified format, and compiling such data within 7 days from the end of each quarter.

3. 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.

4. 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 Compliance Officer of the Investment Manager is designated as Grievance Redressal Officer under this Policy.

5. 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 regulatory and operating front by the Compliance Officer of the Company.

6. 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.

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PART B – PERSONAL DATA GRIEVANCE REDRESSAL MECHANISM

7. Definitions (Applicable to Part B only)

- a) **“Act” or “DPDP Act”** means the **Digital Personal Data Protection Act, 2023**, as amended from time to time, and the rules made thereunder.
- b) **“Data Principal”** means the individual to whom the personal data relates and includes, where applicable, a lawful guardian of such individual, as defined under the DPDP Act.
- c) **“Data Fiduciary”** means A. K. Alternative Asset Managers Private Limited, as defined under Section 2(i) of the DPDP Act.
- d) **“Personal Data”** means any data about an individual who is identifiable by or in relation to such data, as defined under the DPDP Act.
- e) **“Processing”** means any operation or set of operations performed on personal data, whether wholly or partly automated, including collection, storage, use, disclosure, sharing, or erasure, as defined under the DPDP Act.
- f) **“Grievance”** means any complaint or concern raised by a Data Principal in relation to:
- **processing of personal data by the Company;**
 - **exercise of rights available under the DPDP Act; or**
 - **any act or omission by the Company under the DPDP Act.**
- g) **“Data Protection Board” or “Board”** means the **Data Protection Board of India** constituted under the DPDP Act.

Words and expressions used but not defined in this Part B shall have the meanings assigned to them under the DPDP Act.

For the avoidance of doubt, definitions applicable to Part B are set out separately under Part B of this Policy.

8. Background and Scope

This Part B has been formulated in accordance with **Section 13 of the DPDP Act**. It applies exclusively to grievances raised by Data Principals in relation to personal data processed by the Company.

9. Applicability

This grievance redressal mechanism applies to any personal data of individuals accessed by the Company in the course of its business or in connection with any lawful purpose.

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This Part B of the Policy has been adopted by the Company on May 8, 2026. The provisions contained herein shall be implemented in a phased manner and shall become applicable in accordance with the timelines prescribed under the Digital Personal Data Protection Act, 2023 and rules framed thereunder.

10. Objective

The objective of this Part B is to provide a readily accessible and effective grievance redressal mechanism to data principals, as required under Section 13 of the DPDP Act, and to ensure that grievances relating to personal data are addressed in a fair, transparent and timely manner.

11. Personal Data Grievance Redressal Mechanism

(a) A Data Principal may submit a Grievance by writing to the designated **Grievance Officer** at the contact details set out below, Data Principal to submit 'Grievance Redressal Form' in the form set-out in Schedule A hereto, and submitting the same to:

Grievance Officer:

Mr. Rajesh Rajput

Email: grievance@akalternative.co.in

Address: 604, 6th Floor, Windsor, Off CST Road,

Kalina, Santacruz (East), Mumbai – 400 098

b) If the Data Principal is not satisfied by the resolution provided, he/she/they may also consult the Director of Investment Manager, whose details are mentioned below:

Board of Directors- A. K. Alternative Asset Managers Private Limited

Escalation Email: compliance@akalternative.co.in

Address: 604, 6th Floor, Windsor, Off CST Road,

Kalina, Santacruz (East), Mumbai - 400 098

In all cases, the Investment Manager shall redress grievance or provide requisite response within 90 days from the date of receipt of the grievance.

c) The Company shall endeavour to resolve any personal data grievance within a reasonable period not exceeding ninety (90) days from the date of receipt of grievance, in accordance with Rule 14(3) of the Digital Personal Data Protection Rules, 2025.

12) Escalation and Recourse

Where the Data Principal is not satisfied with the response received, or where no response is received within the prescribed period, the Data Principal may approach the **Data Protection Board of India**, after exhausting the grievance redressal mechanism under this Policy.

13) Review and Amendments

This Part B shall be reviewed periodically to ensure continued compliance with the DPDP Act and the rules made thereunder. Any material changes shall require approval of the Board of Directors of the Company.

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Annexure I

Resolution Process:

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

Mr. Rajesh Rajput,
Grievance Redressal Officer
Email: grievance@akalternative.co.in
Address: 604, 6th Floor, Windsor, Off CST Road,
Kalina, Santacruz (East), Mumbai - 400 098

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

Board of Directors- A. K. Alternative Asset Managers Private Limited
Escalation Email: compliance@akalternative.co.in
Address: 604, 6th Floor, Windsor, Off CST Road,
Kalina, Santacruz (East), Mumbai - 400 098

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

- c) 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](https://scores.sebi.gov.in/scores-home) portal of SEBI i.e. <https://scores.sebi.gov.in/scores-home>. 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 resolve the complaint and upload the Action Taken Report ("ATR") on SCORES 2.0 within 21 calendar days of receipt of such Complaint.
- e) 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
- f) 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

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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 complaint through 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 A K Alternative Investments Trust II under the ‘Category 2 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

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SCHEDULE A

GRIEVANCE FORM

- ☐ Existing Investor- Individual
- ☐ Existing Investor- Non-Individual
- ☐ Other
- ☐ Data Principal

Tick as applicable

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

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]