

## INVESTOR CHARTER FOR ALTERNATIVE INVESTMENT FUND

### Investor Charter for Alternative Investment Funds

#### A. Vision and Mission Statement:

##### Vision

Invest into public and private companies in India and generate returns by utilising sectoral expertise of the investors and the Investment Manager while adhering to high professional, ethical standards and complying with applicable regulations.

##### Mission

- To tap into and leverage collaborative intelligence of LPs to make investment decisions
- Comply with all applicable regulations and 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 companies in accordance with investment strategy stated in Fund documents, with an objective to generate positive returns for the investors. The fund will invest into private and public companies with not more than 25% investment into foreign companies
- Post closure the AIF will distribute returns to the investors as per the fund documents

#### C. Details of services provided to investors:

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

1.1. Sharing of Private Placement Memorandum (PPM).

1.2. Account opening with the AIF:

- Completing KYC of investors and registration of KYC with KRAs. – In process
- Sharing of copies of fund documents with investors. - Completed
- Entering into contribution agreement with investor. \_ Completed
- Drawdown notice has been shared with each investor - Completed

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

2.1. Change in the sponsor or the manager of the AIF.

There is no material change in Sponsor or no change in Manager of the AIF

## 2.2. Change in control of the sponsor or the manager of the AIF.

There is no change in Sponsor or Manager of the AIF

## 2.3. Material changes to terms of PPM

- Term of Fund – No Change.
- Investment Strategy- No Change
- Increase in fees and charges. – No Change

## 2.4. Winding up of Fund/ Scheme prior to expiry of tenure.

- if it is impossible to continue with the Fund or if the Trustee on advice of the Investment Manager deems it impracticable to continue the Fund
- where the purpose of the Fund has been fulfilled
- if the Trustee, acting on the recommendation of the Investment Manager, is of the opinion that the Fund be wound up in the interest of all the Investors
- where SEBI has passed a direction for the winding up of the Fund

## 3. Dissemination of financial information of Fund.

- 3.1. Net Asset Value of Fund/ Scheme. (Quarterly)
- 3.2. Financial information of investee companies. (Quarterly)
- 3.3. Information on performance of scheme/fund. (Monthly)

## 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.

No disclosures required.

4.2. Any material liability arising during the tenure of the fund.

No disclosures required.

4.3. Any breach of a provision of the PPM or any other agreement made with the investor or any other fund documents.

No disclosures required.

4.4. Intimation regarding any conflict of interest.

No disclosures required.

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.

As disclosed in PPM

## 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 AIF or its Manager or Sponsor
- Contact details such as email-id, contact number, etc. of AIF or its Manager or Sponsor

No Material changes in the operation of the fund since the inception of the fund

## 6. Grievance redressal

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

All the investor grievances shall be redressed in timely manner or as per the procedure laid down in the PPM.

### D. Timelines of the activity/services provided to investors:

Sr. No.	Description of activity/services provided by Alternative Investment Funds (sAIFs) to its investors	Timeline for completion of activity
<b>1.</b>	<b>Valuation related disclosures:</b>	
a.	Valuation of investment by Category I and II Alternative Investment Fund	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 NAV of scheme(s) of the Category III Alternative Investment Fund	Close ended fund - quarterly basis

**Transparency related disclosures:**

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|----|--|---|
| a. | Disclosure of financial information of investee companies  | Being a Category III AIF, Vasuki India shall disclose the same within 60 days from the end of the quarter end or earlier as per the fund documents. |
| b. | Disclosure of Material risks: 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 | Being a Category III AIF, Vasuki India shall disclose the same within 60 days from the end of the quarter end or earlier as per the fund documents. |
| c. | Financial, risk management, operational, portfolio, and transactional information regarding fund investments   | It shall be disclosed periodically to the investors   |
| d. | Any fees ascribed to the Manager or Sponsor; and any fees charged to the Alternative Investment Fund or any investee company   | It shall be disclosed periodically to the investors   |
| e. | Any inquiries/ legal actions by legal or regulatory bodies in any jurisdiction   | Vasuki India works to keep a high compliance and risk management standard. Investors shall be informed in case such an event occurs                 |
| f. | Any material liability arising during the Alternative Investment Fund's tenure   | Vasuki India works to keep a high compliance and risk management standard. Investors shall be informed in case such an event occurs                 |
| g. | Any breach of a provision of the placement memorandum or   | Vasuki India works to keep a high compliance and risk management standard. Investors shall  |

	agreement made with the investor or any other fund documents	be informed in case such an event occurs
h.	Intimation regarding conflict of interest in any transaction	Vasuki India works to keep a high compliance and risk management standard. Investors shall be informed in case such an event occurs
i.	Any change in terms of Private Placement Memorandum /fund 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. Vasuki India AIF shall redress all investor complaints in timely manner.
2. As per the PPM, The Investors may report any grievances in respect of the activities of the Fund to the Grievance Officer designated by the Investment Manager and intimated to the Investors from time to time. Any disputes arising in relation to the activities of the Fund will addressed in timely manner or as per the procedure laid down in the PPM.
3. Investors can also approach SEBI for redressal of their complaints through SEBI SCORES platform. On receipt of complaints, SEBI takes up the matter with the concerned AIF.
4. 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 fund documents including Private Placement Memorandum, 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 Alternative Investment Fund 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 fund documents.