

BTH Partners LLP

GRIEVANCE REDRESSAL POLICY

("Policy")

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Part I: Background

BTH Partners LLP, a Limited Liability Partnership (LLP) in India is registered under the Limited Liability Partnership Act, 2008, and acting as the investment manager ("**Investment Manager**") to following alternate investment funds (**AIF**) registered under Securities and Exchange Board of India (Alternative Investment Funds) Regulations, 2012 ("**AIF Regulations**"):

Sr. No.	Name of the Fund
1.	BTH Classic Growth Fund (" Fund "), a scheme of BTH Capital, a trust registered as a Category III Alternative Investment Fund under AIF Regulations bearing registration number IN/AIF3/25-26/2070 .

All capitalized terms used in this Policy but not defined shall have the meaning assigned to them in the Private Placement Memorandum of the Fund.

Part II: Preamble and Objective

The objective of the Investor Grievance Redressal Policy (the "**Policy**") is to provide efficient services to the investors and to effectively address and redress the grievances of the investors in a timely manner. It also helps build investor confidence by formulating investor grievance redressal mechanism and to develop friendly relations with the investors.

The Investment Manager should:

- Ensure visibility and accessibility of complaint handling process to all complainants.
- Provide access to grievance redressal policy to investors on need to know basis.
- Handle complaints professionally & in a transparent manner.
- Ensure confidentiality of complainants information unless required for addressing the complaint.
- Ensure clear accountability for resolution and reporting of complaints.
- Ensure complaints are dealt with in a timebound manner.
- Ensure investor awareness on how investors can raise their issues and complaints and escalate if they are not satisfied with the resolution or handling.
- Continually improve its processes & systems by taking inputs/ feedback from the investors.

The Investment Manager shall address all the queries/ grievances/ concerns brought to its attention by the investors and also classify & differentiate queries, requests, and complaints, etc. and accordingly resolve them to the satisfaction of the concerned investors.

The Compliance Officer is responsible for ensuring provision of prompt and effective services to the investors and monitoring the relevant email address of the Fund for investor grievances.

Part III: General Principle

- Investors are treated fairly at all times.
- Grievances / complaints raised by Investors are dealt with courtesy and in a timely manner.
- Queries and grievances / complaints are treated efficiently and fairly.
- The investment manager of the Fund works in good faith and towards the interests of the Investors.

Part IV: Escalation Process

Level 1 - Raise with the Investment Manager / RTA:

All grievances/ disputes/ complaints against the Company/RTA are required to be directly lodged with the Investment Manager / RTA. Investors may lodge the same by sending an email to contact@bthcapital.in or by sending physical correspondence at:

BTH Capital
Awfis, Banquet 1-20, 14th floor, INS Tower
G Block, BKC, Bandra East, Mumbai - 400051

Level 2 - SEBI Complaints Redress Systems ("SCORES"):

The grievances/ disputes/ complaints which remain unresolved at Level 1, or if the investor is not satisfied with the resolution provided by Investment Manager / RTA, then a complaint may be raised on SCORES platform of SEBI which can be accessed at <https://www.scores.gov.in>.

Level 3 - ODR Platform:

In case the investor is not satisfied with the resolution provided at Level 1 or 2, then the online dispute resolution process can be initiated through the ODR portal.

Important notes with respect to ODR portal are as under:

- a. The link to access the ODR Portal is <https://smartodr.in/login>. The relevant SEBI circular for online dispute resolution can be accessed at https://www.sebi.gov.in/legal/master-circulars/dec-2023/master-circular-for-online-resolution-of-disputes-in-the-indian-securities-market_80236.html
- b. It may be noted that the dispute resolution through the ODR portal can be initiated only if such complaint / dispute is not pending before any arbitral process, court, tribunal or consumer forum or if the same is non-arbitrable under Indian Law.
- c. There shall be no fees for registration of a complaint/dispute on the ODR portal, and the fees for conciliation or arbitration process including applicable GST, stamp duty etc. shall be borne by the Investor /Investment Manager / other market participant as the case may be.

Part V: Management Information System (MIS) report of Investor Complaints

An MIS report of the complaints received, pending, and resolved will be placed before the board of the Investment Manager, at regular intervals for their review and information.

Part VI: 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 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.

Part VII: Review of Policy

Amendments/Updates, Review, and control

The Compliance Officer will review this Policy on an annual basis or earlier, if required, in light of change in regulatory compliance and business reasons.

If there are any regulatory changes, the effective date of the amendment will be from the date when the notification of the amendment is received.