

## **INVESTOR GRIEVANCE REDRESSAL POLICY**

### **A. TITLE**

This Policy shall be called ‘Investor Grievance Redressal Policy’.

### **B. PREAMBLE AND OBJECTIVE**

- a. This Policy is formulated to provide efficient services to the investors and to effectively address and redress the grievances of the investors of India Grid Trust (IndiGrid) in a timely manner.
- b. The coverage of this policy is to redress the grievance of all the securities issued by IndiGrid, which are listed on the stock exchanges in India.
- c. This Policy was approved by the Stakeholders Relationship Committee of the Board of IndiGrid Investment Managers Limited (Investment Manager of IndiGrid) in its meeting held on October 27, 2021.
- d. The Units and Non-Convertible Debentures of IndiGrid are listed on BSE Limited (BSE) and/or National Stock Exchange of India Limited (NSE).
- e. IndiGrid has appointed M/s. KFIN Technologies Private Limited as its Registrar & Transfer Agents (“RTA”) to ensure faster and efficient provision of services to the investors. The RTA is primarily responsible for handling the securityholders related affairs of IndiGrid.
- f. The Board has appointed the Company Secretary to act as Compliance Officer of IndiGrid under the SEBI (Infrastructure Investment Trusts) Regulations, 2014 (“InvIT Regulations”). As Compliance Officer, the Company Secretary is responsible for ensuring provision of prompt and effective services to the securityholders and monitoring the dedicated email address of IndiGrid for investor grievances.

### **C. DEFINITION**

For the purpose of this Policy, the following words will carry the meaning as under:

- a. “**Board**” means the Board of Directors of IndiGrid Investment Managers Limited.
- b. “**IndiGrid**” or “**Trust**” means India Grid Trust.
- c. “**Policy**” means this Policy on Investors’ Grievance Redressal Mechanism.
- d. “**SCORES**” is a web based centralized grievance redressal system of SEBI (<http://scores.gov.in>), which enables the investors to lodge and track anywhere the status of redressal of such complaints online from the above website.
- e. “**Stipulated Turnaround Time**” means the timelines as specified in the “Investor Service Timelines” section of this Policy or prescribed statutory timelines (if any), whichever is earlier.

The words and phrases not defined under this Policy will carry the same meaning as defined under the Trust Deed of IndiGrid; the Securities and Exchange Board of India Act, 1992 read with the rules and regulations made thereunder, including the InvIT Regulations.

## **D. INVESTOR SERVICE TIMELINES**

IndiGrid and its RTA follow the following timelines for performance of its duties toward securityholders:

1. All investors communication or grievances in relation to following matters shall be addressed by RTA within 5 working days from the date of receipt of such grievance or communication
  - a. Issue or non-receipt of TDS certificates/ Form 64B,
  - b. Request for copy of Annual Report,
  - c. Non-receipt of Distribution or Interest,
  - d. Request for providing details of Distribution and Interest paid,
2. All investors grievance or communication regarding re-processing of Distribution or Interest and all other grievance or communication not specifically covered in this policy should be addressed by RTA within 10 working days from the date of receipt of such grievance or communication.

In case RTA requires any additional information or supporting document to address such grievance or communication, the return communication stating details of desired information or document should be released within respective Stipulated Turnaround Time. After receipt of requested information or document, the RTA should address such grievance or communication within respective Stipulated Turnaround Time.

## **E. CLASSIFICATION OF SECURITYHOLDER COMMUNICATION**

The IndiGrid receives various correspondence / communication from the investors relating to the Units, annual reports, distribution and ancillary matters. These communications may either be complaints or mere queries / requests by the securityholders. The IndiGrid presently follows a set of guidelines for classifying the securityholders' communication between general correspondence, requests, complaints, etc.

The IndiGrid strives to follow highest standards of corporate governance, transparency and disclosures at all times. With a view to ensure greater transparency and as a part of IndiGrid's investor-friendly initiatives, the Stakeholders Relationship Committee has considered it appropriate and desirable to formally document the present guidelines w.r.t classification of securityholders' communication through this Policy. The IndiGrid has also formulated a set of frequently asked questions ([FAQs](#)) in respect of Units related matters for better securityholder awareness. Investors can refer the same at on the website of the IndiGrid.

In addition to the above, the Policy broadly defines its investor servicing timelines as mentioned above and further lays down the process for redressal of complaints and the escalation matrix thereof.

### *General Principle guiding classification of securityholders' communication*

- a. Multiple correspondence / communications or reminders received for the same matter within the stipulated turnaround time in this Policy for handling of the query / communication will be treated as one complaint.
- b. If a query is resolved after the stipulated turnaround time and there is no reminder from the securityholder during such time period, such query will not be treated as complaint.

- c. In case of any ambiguity, the Company Secretary shall be the sole authority to decide on the nature and classification of the communication and the decision of the Company Secretary shall be final and binding.
- d. For clarity, examples of request v/s complaint / grievance are presented below:

***Classification of securityholders' communication***

Sr. No.	<i>Communication not treated as complaint</i>	<i>Communication treated as complaint</i>
<b>a.</b>	<b><i>Non-receipt of annual report</i></b>	
	<p>First request or any such communication w.r.t. non - receipt of annual report will be considered as a request if, the IndiGrid has dispatched the annual report to the securityholder on or before the due date(s) through permissible means.</p> <p>Such communication shall be treated as request for an additional copy of the annual report. IndiGrid shall respond to the request by intimating the original date of dispatch of annual report and will also share a copy of the annual report in compliance with the securityholder's request.</p>	<p>Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if,</p> <p>⇒ the IndiGrid / RTA has not dispatched the annual report to the securityholder on or before the due date(s), or</p> <p>⇒ the IndiGrid / RTA has not responded to securityholder's request within the stipulated turnaround time.</p>
<b>b.</b>	<b><i>Non-receipt of distribution / interest</i></b>	
	<p>First request or any such communication w.r.t. non-receipt of distribution / interest will be considered as a query / request if, the IndiGrid has credited the distribution / interest to the bank account of the securityholder or dispatched demand drafts on or before the due date(s).</p> <p>When the IndiGrid is unable to pay out the distribution / interest:</p> <p>⇒ In case where the distribution / interest is to be credited to the bank account of the securityholder, and such credit has been declined by the bank, the IndiGrid will pay out the distribution / interest through a demand draft in favour of the securityholder.</p> <p>⇒ In case the dispatched demand draft is returned undelivered, the IndiGrid will proceed with re-dispatching the demand draft only upon a written request by the securityholder. Such communication from the securityholder will be treated as a request and not a complaint.</p>	<p>Any communication w.r.t. non-receipt of demand drafts sent to the IndiGrid or to the RTA after the expiry of the stipulated turnaround time for issuance of duplicate demand draft will be considered as complaint.</p>
<b>c.</b>	<b><i>Non-receipt of TDS Certificates / Form 64B</i></b>	
	<p>Non-receipt of TDS Certificates / Form 64B will be considered as a query if, the IndiGrid has dispatched the</p>	<p>Communication w.r.t. non-receipt of TDS certificate(s) / Form 64B after the expiry of</p>

	<p>TDS Certificates / Form 64B within prescribed time limits.</p> <p>The IndiGrid shall respond to the query by sharing details of email communication or dispatch to the securityholders. It is clarified that upon the delivery of email or dispatch of TDS certificate / Form 64B through registered post or courier or any other approved mode, the IndiGrid shall be deemed to have discharged its duty and the securityholders are expected to check their emails or coordinate with the postal / courier agency for the TDS certificates / Form 64B dispatched.</p>	<p>the statutory period or stipulated turnaround time, as the case may be, for giving effect to the respective request will be treated as a complaint if, the IndiGrid has not dispatched the TDS certificates / Form 64B to the securityholder.</p>
<p><b>d. Securityholder communication through statutory authorities</b></p>		
	<p>Any communication from investors through statutory authorities which:</p> <ul style="list-style-type: none"> <li>⇒ is not treated as a complaint by the statutory authority, and</li> <li>⇒ which would not have been treated as a complaint by the IndiGrid if it was directly addressed to the IndiGrid,</li> </ul> <p>will not be treated as a complaint.</p> <p>As per SEBI circular dated March 26, 2018, any grievances submitted to SEBI through SCORES will not be treated as complaints if the grievance is redressed by the IndiGrid within 30 days. Accordingly, such grievances registered with SEBI, will be not treated as complaints by the IndiGrid.</p>	<p>At times, requests / grievances are directly communicated to the statutory authorities by the investors. Such communications may not always qualify as a complaint under the guidelines adopted by the IndiGrid.</p> <p>However, since the statutory authorities treat all communication received from investors as complaint, regardless of the nature of such communication, the IndiGrid is constrained to follow the classification as followed by the statutory authorities.</p> <p>Accordingly, any communication from investors received through statutory authorities viz. stock exchanges, SEBI, etc. which is treated as complaint by such statutory authority, will be treated as a complaint by the IndiGrid.</p>
<p><b>e. Others</b></p>		
	<ul style="list-style-type: none"> <li>i. Correspondence w.r.t. complete breakup details of Distribution/Interest, Re-processing of Distribution/Interest for cases like stale DD, transmission etc. will be considered as a request and not as a complaint if, the request is addressed within the stipulated turnaround time.</li> <li>ii. Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.</li> <li>iii. Any communication requisitioning information or documents relating to the IndiGrid or its operations as per statutory rights available to the securityholders will be treated as request if, the requisition is in proper format and the IndiGrid has responded to the same within prescribed time limits.</li> </ul>	<p>Any communication from the investor not responded to by IndiGrid or RTA or not responded by IndiGrid or RTA within the stipulated turnaround time will be considered as complaint.</p>

	<p>iv. Incomplete communications, communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint.</p>	
	<p>v. Communications / complaints in relation to matters that are sub- judice will not be treated as a complaint under this Policy.</p>	

## F. INVESTOR GRIEVANCE REDRESSAL MECHANISM

- a. Investors can lodge a complaint for non-receipt of any right available to them or failure of the RTA / IndiGrid to comply with any statutory obligation by giving details of their name, folio no., DP ID / Client ID, nature and full particulars of their complaint directly to the RTA.
- b. Any information, other than those specified above or any supporting documentation required for redressal of the complaint shall be informed to the investors by the RTA. Investors are requested to furnish all the requisite information along with duly executed documents at the earliest to avoid any delay in redressal of their complaints.
- c. In case of non-satisfactory response from RTA, investors can also lodge their complaints through the IndiGrid's designated email id for investor grievances – [complianceofficer@indigrid.co.in](mailto:complianceofficer@indigrid.co.in) or [investorrelations@indigrid.co.in](mailto:investorrelations@indigrid.co.in). The designated email ids are also displayed on the IndiGrid's website. Alternatively, investors can send their complaints at the principal place of business of the IndiGrid.
- d. If the investor does not receive a reply from the RTA within the stipulated turnaround time, he / she may approach the IndiGrid at the credentials mentioned above.
- e. Investors are requested to approach the IndiGrid, for redressal of their concerns before raising their concerns with the regulatory authorities.
- f. Only complaints sent on the addresses / email ids mentioned in this Policy will be treated as valid complaints.
- g. The IndiGrid periodically obtains status report of the complaints from the RTA.
- h. The Stakeholders Relationship Committee is responsible for the examination and redressal of the complaints by investors.
- i. As required under SEBI Circular No. CIR/IMD/DF/127/2016 dated November 29, 2016, the IndiGrid files with the Stock Exchanges and places the statement of investor complaints at the Stakeholders Relationship Committee and Board meeting on a quarterly basis. Further, IndiGrid also submits statement of investor complaints to Trustee of IndiGrid on a quarterly basis. Further, the IndiGrid also makes annual disclosure of investor complaints in its annual report pursuant to the InvIT Regulations.

## G. CONTACT DETAILS

The escalation matrix for complaints relating to the securities of IndiGrid is as provided below:

<b>Level 1</b>	Mr. Ashwin Rajput / Mr. Shivam Pathak India Grid Trust Unit No.101, First Floor, Windsor, Village Kole Kalyan Off CST Road, Vidyanagari Marg, Santacruz (East), Mumbai – 400 098, Maharashtra, India Ph: +91 70284 93885 Email ID: secretarial@indigrid.com
<b>Level 2</b>	Mr. Urmil Shah / Mr. Swapnil Patil India Grid Trust Unit No.101, First Floor, Windsor, Village Kole Kalyan Off CST Road, Vidyanagari Marg, Santacruz (East), Mumbai – 400 098, Maharashtra, India Ph: +91 70284 93885 Email ID: complianceofficer@indigrid.co.in
<b>Level 3</b>	The investor may approach the Securities and Exchange Board of India and file their grievance through “SCORES”, the centralized online system for lodging and tracking complaints.  SCORES facility can be accessed through the web link <a href="http://scores.gov.in">http://scores.gov.in</a> .  Filing complaints on SCORES - Easy & quick a) Register on SCORES portal b) Mandatory details for filing complaints on SCORES are name, PAN, address, mobile number, E-mail ID of the complainant.

## CONTACT DETAILS OF THE RTA

### **KFIN Technologies Private Limited**

**Unit:** India Grid Trust

Karvy Selenium Tower B, Plot No.: 31 & 32, Gachibowli, Financial District, Nanakramguda, Serilingampally, Hyderabad – 500 032, Telangana

**Tel:** 040-33215204

Email Address for NCD related queries: [inward.ris@kfintech.com](mailto:inward.ris@kfintech.com)

Email Address for Units related queries: [support.indiagrid@kfintech.com](mailto:support.indiagrid@kfintech.com)

## H. MISCELLANEOUS

- a. The Chief Executive Officer, Chief Financial Officer or Company Secretary are severally authorised to amend this Policy for giving effect to any changes / amendments notified by the SEBI.
- b. This Policy shall be effective from October 27, 2021 and can be modified, withdrawn or suspended by IndiGrid at its sole discretion without any prior intimation.