

## INVESTOR GRIEVANCE REDRESSAL POLICY FOR NATIONAL HIGHWAYS INFRA TRUST

### A. Preamble

The board of directors of National Highways Infra Investment Managers Private Limited (the "**Board**"), the investment manager to National Highways Infra Trust (the "**Investment Manager**"), has adopted the following policy and procedures (the "**Policy**") with respect to investor grievance redressal. The Board may amend the Policy from time to time, subject to applicable law. This Policy is formulated to ensure efficient services to our investors and effectively address their grievances in a timely manner. Pursuant to various statutes and by virtue of their holding in National Highways Infra Trust (the "**Trust**"), unitholders enjoy several rights, which, *inter-alia*, include the right to receive (i) distributions declared by the Trust on the units; (ii) Annual Reports and notices of General Meetings; and (iii) such other rights available under law or any additional rights as agreed between the investors and the Trust.

**Accordingly, the key principles of the Policy are set out below:**

#### Principles of the Policy:

- All Investors shall be treated equally.
- Complaints raised by Investors shall be dealt with promptly and with courtesy.
- Investors shall be fully informed of avenues to escalate their complaints / grievances outside as well as within the organization and their rights to alternative remedy, if they are not fully satisfied with the response to their complaints. Within the organization, investors shall write to the stakeholders' relationship committee formulated by the Board in this regard ("**Stakeholders' Relationship Committee**"), for further redressal.
- The Trust shall resolve all complaints efficiently and fairly within the regulatory framework.

#### Grievance redressal mechanism:

The Trust has an established mechanism for investor services and grievance handling, with the Stakeholders' Relationship Committee appointed by the Trust for this purpose, being an important functional node.

Some of the key steps undertaken by the Trust for handling Investor Grievances are enumerated as follows:

- The Stakeholders' Relationship Committee is entrusted with handling all unit related matters viz., transfer, transmission, transposition, nomination, dividend, change of name / address / signature, registration of mandate / Power of Attorney, replacement / DEMAT / REMAT of units.
- Investors can lodge a complaint for non-receipt of any right available to them or failure of the Trust 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 Stakeholders' Relationship Committee, including for matters relating to units/dividend transferred to Investor Education and Protection Fund (IEPF).
- 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 Stakeholders' Relationship Committee. Investors are requested to furnish all the requisite information alongwith duly executed documents at the earliest to avoid any delay in redressal of their complaints.
- In case of non-satisfactory response from Stakeholders' Relationship Committee, investor can also lodge their complaints with the compliance officer of the Trust through the Trust's designated e-mail ID for investor grievances as mentioned on the website of the Trust or the draft placement memorandum. The designated e-mail ID is also displayed on the Trust's website. Alternatively, investors can send their complaints at the SEBI Complaints Redress Systems platform.
- Investor grievances received through any other channel (including Registrar and Unit Transfer Agents (RTA)) shall be reviewed regularly and replied/resolved appropriately. Investor grievances received and resolved directly by RTA shall be reviewed by compliance officer periodically.
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- If the investor doesn't receive a reply from the Stakeholders' Relationship Committee / compliance officer within stipulated turnaround time of 30 working days, the investor may write to the Trust again, however, investors are urged to refrain from sending multiple reminders during the above mentioned turn around period for redressal of their complaints.
- Investors are requested to approach the Stakeholders' Relationship Committee, or in case of any inaction by the Stakeholders' Relationship Committee, the compliance officer of the Trust, for redressal of their concerns prior to raising their concerns with the regulatory authorities.
- The Trust shall periodically obtain status report of the Complaints from the compliance officer of the Trust. Further, internally secretarial staff checks the designated investor grievances e-mail ID on daily basis to check whether any new complaint has been lodged.
- The Trust shall make annual disclosures of the statement of investor complaints in its annual report.
- The compliance officer of the Trust is authorised to amend the Policy from time to time to give effect to any changes / amendments notified by any regulatory authority. The amended Policy shall be placed before the unitholders for noting and ratification.

Adopted by the Board of Directors of National Highways Infra Investment Managers Private Limited on behalf of the Trust on February 3, 2021 and amended on September 27, 2021.

Certified True Copy



Authorised Signatory

Name: **MATHEW GEORGE**

Designation: **CFO, NHIIMPL**