



SHREM INFRA INVESTMENT MANAGER PRIVATE LIMITED
(formerly known Shrem Financial Private Limited)

INVESTOR GRIEVANCE REDRESSAL POLICY

This Policy is approved by the Board of the Investment Manager with effect from 29th July 2025

INVESTOR GRIEVANCE REDRESSAL POLICY (“Policy”)

PREAMBLE AND OBJECTIVE

- a. This Policy is formulated to provide efficient services to investors and to effectively address and redress investor grievances of Shrem InvIT (the “**Trust**”) in a timely manner.
- b. The coverage of this Policy extends to the redressal of grievances related to all securities issued by the Trust, which are listed on stock exchange in India.
- c. The objective of this Policy is to promote and establish a prompt investor grievance redressal mechanism and foster investor friendly relations.
- d. This Policy was approved by the board of directors of Shrem Infra Investment Manager Private Limited (“**Investment Manager**”) at its meeting held on 29th July, 2025.
- e. The Registrar and Transfer Agent (“**RTA**”), appointed by the Trust, will ensure faster and efficient provision of services to the investors. The RTA is primarily responsible for handling securityholder related affairs of The Trust.
- f. The Compliance Officer of the Trust under the SEBI (Infrastructure Investment Trusts) Regulations, 2014, as amended (“**InvIT Regulations**”), is responsible for ensuring the provision of prompt and effective services to securityholders and for monitoring the Trust’s dedicated email address for investor grievances.

DEFINITION

For the purpose of this Policy, the following terms shall have the meanings assigned below:

- a. “**Board**” means the board of directors of Shrem Infra Investment Manager Private Limited.
- b. “**SCORES**” refers to the web based centralized grievance redressal system of SEBI (<https://scores.sebi.gov.in/>), which enables investors to lodge and track complaints online.
- c. “**Stipulated Turnaround Time**” means the timelines specified in the “Investor Service Timelines” section of this Policy or any prescribed statutory timelines, whichever is earlier.
- d. “**Units**” shall mean units issued by the Trust.

Terms not defined in this Policy shall have the meanings as defined under the trust deed of the Trust; the Securities and Exchange Board of India Act, 1992 and the applicable rules and regulations made thereunder, including the InvIT Regulations.

INVESTOR SERVICE TIMELINES

The Trust and its RTA adhere to the following timelines for the performance of its duties toward securityholders:

1. Matters such as non-receipt of the annual report and notice of postal ballot are to be addressed by the RTA within a period of 5 (five) working days from the receipt of the request or in case, any supporting documents are required by the RTA for addressing the request, within a period of 5 (five) working days from the receipt of such documents to the RTA’s satisfaction.

2. Matters other than those referred to in point (1) above, including but not limited to distribution/interest, are to be addressed by the RTA within a period of 7 (seven) working days from receipt of the request.

In case, any supporting documents are required by the RTA from the Security Holder or any other party for addressing the request, such matters will be addressed within a period of 15 (fifteen) days from the receipt of such documents to the RTA's satisfaction.

CLASSIFICATION OF SECURITYHOLDER COMMUNICATION

The Trust may receive various types of correspondence / communication from investors relating to Units, annual reports, distributions, and other ancillary matters. These communications may either be complaints or mere queries / requests by the securityholders.

The Trust is committed to maintaining the highest standards of corporate governance, transparency, and disclosure at all times. To ensure transparency and as a part of the Trust's investor-friendly initiatives, the Board has considered it appropriate and desirable to formally document the guidelines for classification of securityholder communications through this Policy.

In addition to the above, this Policy broadly defines the investor servicing timelines outlined above and establishes the process for redressal of complaints, including the escalation matrix.

General Principle guiding classification of securityholders' communication

- a. Multiple correspondences / communications or reminders received for the same matter within the Stipulated Turnaround Time shall be treated as a single complaint.
- b. If a query is resolved after the Stipulated Turnaround Time but no reminder is received from the securityholder during that period, such query shall not be treated as a complaint.
- c. In case of ambiguity, the Compliance Officer shall have sole authority to determine the nature and classification of communication, and the Compliance Officer's decision shall be final and binding.
- d. For clarity, examples of requests vs. complaints / grievance are presented below:

Classification of securityholders' communication

Sr. No.	<i>Communication not treated as complaint</i>	<i>Communication treated as complaint</i>
a.	<i>Non-receipt of annual report</i>	
	First request or any such communication for non-receipt of the annual report will be considered as a request if the Trust dispatched the annual report to the securityholder on or before the due date using permissible means. Such communication shall be treated as request for an additional copy of the annual report. The Trust will respond to the request by confirming the original date of dispatch of the annual report and will also share a copy of the annual	Subsequent request(s) for non-receipt of annual report will be treated and recorded as a complaint if the Trust / RTA failed to dispatch the annual report to the securityholder on or before the due date, or the Trust / RTA did not respond to securityholder's request within the Stipulated Turnaround Time.

Sr. No.	<i>Communication not treated as complaint</i>	<i>Communication treated as complaint</i>
	report in compliance with the securityholder's request.	
b.	<i>Non-receipt of distribution / interest</i>	
	<p>First request or any such communication with respect to non-receipt of distribution / interest will be considered as a query / request if the Trust has credited the distribution / interest to the bank account of the securityholder or dispatched demand drafts on or before the due date.</p> <p>When the Trust 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 Trust will pay out the distribution / interest through a demand draft in favor of the securityholder.</p> <p>In case the dispatched demand draft is returned undelivered, the Trust will proceed with re-dispatching the demand draft only upon a written request by the securityholder.</p> <p>Such communication from the security holder will be treated as a request and not a complaint.</p>	Any communication with respect to non-receipt of demand drafts sent to the Trust or to the RTA after the expiry of the Stipulated Turnaround Time for issuance of duplicate demand draft will be considered as complaint.
c.	<i>Non-receipt of TDS Certificates / Form 64B</i>	
	<p>Non-receipt of TDS certificates / Form 64B will be considered as a query if, the Trust has dispatched the TDS certificates / Form 64B within the prescribed timelines.</p> <p>The Trust will respond to the query by sharing details of email communication or dispatch to the securityholders.</p> <p>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 Trust shall be deemed to have</p>	Communication with respect to non-receipt of TDS certificate(s) / Form 64B after the expiry of 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 Trust failed to dispatch the TDS certificates / Form 64B to the securityholder.

Sr. No.	<i>Communication not treated as complaint</i>	<i>Communication treated as complaint</i>
	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.	
d.	<i>Securityholder communication through statutory authorities</i>	
	<p>Any communication from investors through statutory authorities which:</p> <p>(i) is not treated as complaints by statutory authorities, and which would not have been treated as a complaint by the Trust if it was directly addressed to the Trust, will not be treated as complaints.</p> <p>(ii) per SEBI's circular dated September 20, 2023, grievances submitted on SCORES will not be treated as complaints if the grievances are redressed by the Trust within 21 days.</p> <p>Accordingly, such grievances registered with SEBI, will not be treated as complaints by the Trust.</p>	<p>At times, requests / grievances are directly communicated to statutory authorities by the investors. Such communications may not always qualify as a complaint under the guidelines adopted by the Trust.</p> <p>However, since statutory authorities treat all communication received from investors as complaint, regardless of the nature of such communication, the Trust is constrained to follow the classification as followed by statutory authorities.</p> <p>Accordingly, any communication from investors received through statutory authorities viz. stock exchanges, SEBI, etc. which is treated as complaints by such statutory authorities, will be treated as complaints by the Trust.</p>
e.	<i>Others</i>	
	<p>Correspondence with respect to 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.</p> <p>Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.</p> <p>Any communication requisitioning information or documents relating to the Trust 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</p>	<p>Any communication from the investor not responded to by the Trust or the RTA or not responded by the Trust or the RTA within the Stipulated Turnaround Time will be considered as complaints.</p>

Sr. No.	Communication not treated as complaint	Communication treated as complaint
	Trust has responded to the same within prescribed time limits.	
	Incomplete communications, communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint.	
	Communications / complaints in relation to matters that are sub- judice will not be treated as a complaint under this Policy.	

INVESTOR GRIEVANCE REDRESSAL MECHANISM

- Investors may lodge complaints regarding non-receipt of any right available to them or failures by the RTA / Trust to meet statutory obligations, by providing their name, folio no., DP ID / Client ID, nature and full particulars of the complaint directly to the RTA.
- Any information, other than that specified above or any supporting documentation required for redressal of the complaint shall be provided to the investors by the RTA. Investors are requested to furnish all the requisite information along with duly executed documents promptly to avoid any delays in redressal of their complaints.
- In case of unsatisfactory response from the RTA, investors may lodge their complaints through the Trust's designated email id for investor grievances compliance.team@shreminvit.com. The designated email id is also available on the Trust's website. Alternatively, investors can send their complaints at the principal place of business of the Trust.
- If the investor does not receive a reply from the RTA within the Stipulated Turnaround Time, investors may approach the Trust directly at the credentials mentioned above.
- Investors are requested to approach the Trust for redressal of their concerns before raising their concerns with regulatory authorities.
- Only complaints sent to the addresses / email ID mentioned in this Policy will be treated as valid complaints.
- The Trust periodically obtains status reports on complaints from the RTA.
- The Board will examine and ensure proper redressal of the investor complaints.
- The Trust shall file statements of investor complaints with the stock exchange and present them to the Board periodically, in accordance with applicable laws.

CONTACT DETAILS

The escalation matrix for complaints relating to the securities of the Trust is as follows:

Level 1	MUFG Intime India Private Limited (formerly known as Link Intime India Private Limited) C 101, Embassy 247, Lal Bahadur Shastri Marg, Vikhroli West, Mumbai-400083 Maharashtra
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	<p>Contact Person : Mr. Ajit Patankar</p> <p>Phone: 022 4918 6000</p> <p>Email: bonds.helpdesk@linkintime.co.in</p>
Level 2	<p>Shrem Infra Investment Manager Private Limited (formerly known Shrem Financial Private Limited)</p> <p>1001, 10th Floor, Viraj Towers, JN of Andheri Kurla Road, W. E. Highway, Andheri (East) Mumbai – 400093</p> <p>Contact Person : Compliance Officer</p> <p>Phone - 022-42285600</p> <p>Email - compliance.team@shreminvit.com</p>
Level 3	<p>Investors may approach the Securities and Exchange Board of India and file grievances through “SCORES 2.0”, the centralized online complaint system.</p> <p>SCORES facility can be accessed through the web link https://scores.sebi.gov.in/</p> <p>Investors may send their physical 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€, Mumbai- 400051.</p> <hr/> <p>Filing complaints on SCORES - Easy & quick</p> <p>Register on SCORES portal</p> <p>Mandatory details for filing complaints on SCORES are name, PAN, address, mobile number, E-mail ID of the complainant.</p>

G. MISCELLANEOUS

1. Any amendment/variation to this Policy shall require prior approval of the board of directors of the Investment Manager.
2. Notwithstanding the above, this Policy shall automatically stand amended to the extent of any change in applicable law, without requiring further action by the Investment Manager or the Unitholders of the Trust.
3. This Policy shall be effective from 29th July 2025 and may be modified, withdrawn, or suspended by the Trust at its sole discretion without any prior intimation.
4. In case of any amendment(s), clarification(s), circular(s) etc. issued by relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail, and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.
