

IRB INFRASTRUCTURE TRUST
INVESTOR GRIEVANCE REDRESSAL POLICY
[Adopted on July 25, 2025]

A. Preamble and Objective

This Policy aims to provide efficient services to the investors and to effectively address and redress the grievances of the investors of IRB Infrastructure Trust (“**InvIT**” or “**Trust**”) in a timely manner. The Policy covers grievances of all the unitholders of the InvIT, whose units are listed with National Stock Exchange of India Limited (“**NSE**”) and also for any other securities (subordinate units or debt securities or otherwise) as may be issued by the InvIT from time to time and listed with any of the stock exchanges in India.

The objective of this Policy is to promote investor grievance redressal mechanism and foster investor-friendly relations, ensuring that the InvIT and its investment manager, MMK Toll Road Private Limited (“**Investment Manager**”), commit to complying with Applicable Law, including the InvIT Regulations (*defined below*), and any other related guidelines, circulars, notifications, or clarifications.

The Units of the InvIT are listed on NSE. The InvIT has appointed KFIN Technologies Limited as its Registrar & Unit Transfer Agent (“**RTA**”) to ensure faster and efficient provision of services to the investors. The RTA is primarily responsible for handling the security holder-related affairs of the InvIT.

Compliance Officer:

The Compliance Officer of the InvIT shall act as Compliance Officer under this Policy.

B. Definitions

“**Applicable Law**” shall mean any applicable law, by-law, rule, regulation, guideline, circular, order, notification, regulatory policy (including any requirement under, or notice of, any regulatory body), compulsory guidance, rule, order or decree of any court or any arbitral authority, or directive, delegated or subordinate legislation in any applicable jurisdiction, in India or outside India, including the Indian Trusts Act, 1882, the InvIT Regulations, the SEBI Listing Regulations, the Foreign Exchange Management Act, 1999 and rules, circulars, guidelines and regulations thereunder, and the applicable guidelines, instructions, rules, communications, circulars and regulations issued by any governmental authority including the SEBI, whether in effect as of the date of this Policy, or thereafter.

“**Board**” shall mean the board of directors of the Investment Manager.

“**Compliance Officer**” shall mean the compliance officer of the InvIT.

“**Debt Securities**” shall mean debt securities issued (if any) by the Trust from time to time.

“**InvIT**” or “**Trust**” means IRB Infrastructure Trust.

“InvIT Regulations” means Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014, including any circulars, notifications, guidelines issued thereunder along with the modifications or enactments, thereto, as may be applicable.

“Policy” shall mean this policy on Investors’ Grievance Redressal Mechanism.

“SEBI” shall mean the Securities and Exchange Board of India.

“Securities” shall include Units, subordinate Units, Debt Securities and any other listed securities that may be issued by the InvIT from time to time, in accordance with applicable laws.

“Security Holder(s)” shall mean the person holding Securities of the InvIT.

“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.

“Stakeholders Relationship Committee” means the stakeholders relationship committee constituted by the Board.

“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.

“Unit” shall mean an undivided beneficial interest of the Trust, and such Units together represent the entire beneficial interest of the Trust.

“Unitholder” shall mean unitholder of the InvIT.

The words and expressions used and not defined in this Policy shall have the meaning ascribed to them in the InvIT Regulations; the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 (**“SEBI Listing Regulations”**); and the Securities and Exchange Board of India Act, 1992, read with the rules and regulations made thereunder, as amended.

C. Investor Service Timelines

The InvIT and its RTA should follow the following timelines for performing duties towards the Security Holders:

- For matters such as change of address, non-receipt of annual report, notice of postal ballot/ Annual Meetings / Extra Ordinary Meeting of Unitholders, updation of bank details, issue/non-receipt of TDS certificates/Form 64B, request for copy of annual report, non-receipt of distribution amount and request for providing details of distribution and interest paid, are to be addressed by the RTA

within a period of 5 working days from receipt of the request. If any supporting documents are required by the RTA, these matters will be addressed within a period of 5 working days from the receipt of such documents to the RTA's satisfaction.

- Matters other than those referred above, including but not limited to distribution/interest, are to be addressed by the RTA within a period of 7 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 days from receipt of such documents to the RTA's satisfaction.
- The investor grievances shall be redressed promptly but not later than 21 calendar days, or any other timeline as prescribed under the applicable law, from the date of receipt of the grievance and in such manner as may be specified by the SEBI.
- For resolution of investor grievances received on the SCORES platform and Online Dispute Resolution (ODR) Mechanism, the timeline is within 21 calendar days from the receipt of such complaint. Further, the status of such investor grievances will be disclosed periodically.

D. Investor Grievance Redressal Mechanism

Following mechanism shall be in place for investor services and grievance handling, under regular monitoring and guidance of the Stakeholders' Relationship Committee (SRC).

Level 1: Initial Complaint to RTA:

- Security Holders can lodge a complaint for non-receipt of any right or failure of the RTA/InvIT to comply with statutory obligations by providing details such as their name, DP ID/Client ID (or folio no.), nature, and full particulars of their complaint directly to the RTA at email address of RTA at support.irbtrust@kfintech.com and email ID of the Trust at irbinfrastructuretrust@irb.co.in.
- The RTA/InvIT will inform the Security Holder of any additional information or supporting documentation required for redressal. Investors are requested to furnish all requisite information and documents promptly but not later than 5 working days to avoid delays.

Level 2: Escalation to Compliance Officer:

- In case of a non-satisfactory response from the RTA, or if the Security Holder does not receive a reply from the RTA within the Stipulated Turnaround Time, they can lodge / escalate their complaints to the Compliance Officer of InvIT's designated email id irbinfrastructuretrust@irb.co.in for investor grievances, which is provided in this Policy. The designated email id is also displayed on the official website.
- Only complaints sent to the addresses/email IDs mentioned in this Policy will be treated as valid complaints.
- Investors are urged to refrain from sending multiple emails to other email ids of the Trust or multiple reminders during the Stipulated Turnaround Time. They are also requested to approach the InvIT (RTA or Compliance Officer) for redressal of their concerns before raising their concerns with regulatory authorities.

Level 3: Escalation to Stakeholders Relationship Committee (SRC):

- In case of a non-satisfactory or non-receipt of response from the RTA or the Compliance Officer, within the Stipulated Turnaround Time, the security holders can lodge / escalate their complaints to the Stakeholders Relationship Committee (the SRC) of the Investment Manager vide sending email to email id at grievances@irb.co.in.
- SRC will review and resolve the grievances received from the security holders within 15 days from the escalation request received. SRC will request the security holders to furnish all requisite information and documents promptly but not later than 7 working days to avoid delays.
- Only complaints sent to the email IDs mentioned in this Policy will be treated as valid complaints.
- Compliance Officer of the InvIT will report to SRC and assist SRC in resolving the complaints/grievances received from the security holders.

Redressal via SEBI:

- If the investor's complaint is not redressed satisfactorily by the InvIT or the RTA, they may lodge a complaint with SEBI on SEBI's portal, named 'SCORES' (<https://scores.gov.in>). SCORES is a centralized web-based complaints redress system that facilitates tracking the status of complaints.
- Investors can also use the Online Dispute Resolution (ODR) mechanism (<https://smartodr.in/login>) which is a platform to file complaints/disputes for resolution through online conciliation and arbitration.
- Investors may also send 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 (E), Mumbai - 400 051.

Redressal via BIA:

Investors can also lodge a grievance against the InvIT through the Bharat InvIT Association (the “BIA”) by emailing at bia@bharatinvitsassociation.com.

E. Monitoring and Disclosure of Grievances

- The Investment Manager will periodically obtain status reports of the complaints from the RTA and check the designated email IDs for receiving investor’s grievances.
- All investor complaints/grievances received online through SCORES are checked regularly and resolved expeditiously as required under SEBI Circular No. SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023.
- As required under InvIT Regulations, the Investment Manager shall: (i) file the statement of investor complaints with the stock exchanges and shall also place it before the Board and the trustee of the InvIT on quarterly basis; ; (ii) make annual disclosure of investor complaints in its annual report; ; (iii) make necessary disclosures on website of the InvIT, in the format and within the timelines prescribed by the SEBI.
- The Stakeholders Relationship Committee (SRC) shall be responsible for the examination and redressal of complaints by investors.

F. Contact Details

➤ Registrar and Transfer Agent (RTA):

KFIN TECHNOLOGIES LIMITED

Unit: InvIT & ReIT Operations

Selenium Tower B, Plot No. 31–32, Financial District,

Gachibowli, Nanakramguda, Serilingampally, Hyderabad, Telangana – 500032.

Contact Person: Mr. Eswar Saripalli

Tel: +91 40 6716 2222/1800 309 4001

Fax: +91 40 6716 1563Investor Grievance email ID: einward.ris@kfintech.com

Website: www.kfintech.com

SEBI Registration No.: INR000000221

➤ **Compliance Officer:**

The Compliance Officer, IRB Infrastructure Trust

Principal place of business: 1101, Hiranandani Knowledge Park, Technology Street, Hill Side Avenue, Powai, Mumbai 400 076

Email: irbinfrastructuretrust@irb.co.in

Contact Number: + 91 22 6733 6400

➤ **InvIT Trustee:**

IDBI Trusteeship Services Limited:

Ground Floor, Universal Insurance
Building, Sir Phirozshah Mehta Road,
Fort, Mumbai – 400 001

Contact Person: Mr. Shivaji Gunware / Mr. Sandesh Vaidya

Tel.: +91 22 4080 7000

Fax: +91 6631 1776

E-Mail: itsl@idbitrustee.co.in

G. Conflict with Applicable Law

In case of any inconsistency between the provisions of this Policy with the InvIT Regulations or Applicable Law, the provisions of the InvIT Regulations or Applicable Law shall prevail over the Policy.

H. Review & Amendment

Any amendment or modification to this Policy shall be recommended by the Stakeholders Relationship Committee and approved by the Board, in compliance with Applicable Law.

Notwithstanding the above, this Policy will stand amended to the extent of any change in Applicable Law, including any amendment to the InvIT Regulations or any other Applicable Law, without any action from the Investment Manager or approval of the Unitholders.

...