

## INVESTOR GRIEVANCE REDRESSAL POLICY OF SUSTAINABLE ENERGY INFRA TRUST

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### A. Preamble

This policy (the “**Policy**”) aims to provide efficient services to the investors and to effectively address and redress the grievances of the investors of Sustainable Energy Infra Trust (“**InvIT**”) in a timely manner. The coverage of this policy is to redress the grievances of all the security holders of InvIT, which are listed on the stock exchanges in India. The objective of the Policy is to promote and build prompt investor grievance redressal mechanism and investor friendly relations and also to ensure that the InvIT and its investment manager, Sustainable Energy Infra Investment Managers Private Limited (“**Investment Manager**”) comply with Applicable Law<sup>1</sup>, including the Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014, as amended or supplemented, including any guidelines, circulars, notifications and clarifications framed or issued thereunder (“**InvIT Regulations**”), or such other Indian laws, regulations, rules or guidelines prohibiting insider trading and governing disclosure of material, unpublished price sensitive information.

The units of InvIT are listed on National Stock Exchange of India Limited (“**NSE**”). The non-convertible debt securities of InvIT are listed on Bombay Stock Exchange (“**BSE**”).

InvIT has appointed M/s. KFIN Technologies Limited as its Registrar & Transfer Agent (“**RTA**”) to ensure faster and efficient provision of services to the investors. The RTA is primarily responsible for handling the security holders related affairs of the InvIT.

The board of the Investment Manager (“**Board**”) has appointed the Compliance Officer of the InvIT under the InvIT Regulations. The Compliance Officer is responsible for ensuring provision of prompt and effective services to the security holders and monitoring the dedicated email address of the InvIT for investor grievances.

### B. Definition

- a. “**Board**” shall mean the board of directors of the Sustainable Energy Infra Investment Managers Private Limited.
- b. “**Compliance Officer**” shall mean the compliance officer of the InvIT.
- c. “**Debt Securities**” shall mean debt securities issued by the Trust.

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<sup>1</sup> “**Applicable law**” shall mean the laws having jurisdiction over the matter in question, including all applicable statutes, enactments, acts of legislature, ordinances, rules, bye-laws, regulations, notifications, decrees, arbitral awards, consents, directions, directives, orders or regulations or other governmental or regulatory restrictions or conditions, or any similar form of decision of, or determination by, any governmental authority, including the Securities and Exchange Board of India, whether in effect as of the date of this policy or thereafter, including but not limited to the InvIT Regulations.

- d. **“InvIT”** or **“Trust”** means Sustainable Energy Infrastructure Trust.
- e. **“Policy”** shall mean this Policy on Investors’ Grievance Redressal Mechanism.
- f. **“Securities”** shall include Units, Debt Securities and any other listed securities that may be issued by the InvIT, in accordance with applicable laws.
- g. **“Security Holder(s)”** shall mean the person holding securities of the InvIT.
- h. **“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.
- i. **“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.
- j. **“Units”** shall mean units issued by InvIT.

### **C. Investor Service Timelines**

The InvIT and its RTA shall follow the following timelines for performance of its duties toward the Security Holder:

- a. Matters such as non-receipt of annual report, notice of postal ballot and updation of bank details are to be addressed by the RTA within a period of 5 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 working days from the receipt of such documents to the RTA’s satisfaction.
- b. Matters other than those referred in point (a) above, including but not limited to distribution/interest, are to be addressed by the RTA within a period of 7 working days from the 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 the receipt of such documents to the RTA’s satisfaction.

### **D. Classification of Security Holder’s Communication**

The InvIT receives various correspondences / communications from the Security Holders relating to the securities, annual reports, dividends and ancillary matters. These communications may either be complaints or mere queries / requests by the Security Holders.

The InvIT 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

InvIT's investor-friendly initiatives, the Board has considered it appropriate and desirable to formally document the present guidelines with respect to classification of Security Holders's communication through this Policy.

General Principle guiding classification of Security Holders's 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 Security Holder during such time period, such query will not be treated as complaint.
- c. In case of any ambiguity, the Compliance Officer in consultation with Chairperson of Stakeholder Relationship Committee shall be the sole authority to decide on the nature and classification of the communication and the decision of the Compliance Officer shall be final and binding.
- d. For clarity, examples of request v/s complaint / grievance are presented below:

#### Classification of Security Holder's communication

Sr. No	Communication not treated as complaint	Communication treated as complaint
a.	<b>Non-receipt of annual report</b>	
	First request or any such communication with respect to non - receipt of annual report will be considered as a request if, the InvIT has dispatched the annual report to the Security Holder on or before the due date(s) through permissible means. Such communication shall be treated as request for an additional copy of the annual report. InvIT 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 Security Holder's request.	Subsequent request(s) for non--receipt of annual report to be treated and recorded as a complaint if the InvIT / RTA has not dispatched the annual report to the Security Holder on or before the due date(s) as mandated under the applicable law.
b.	<b>Non-receipt of distribution / interest/ dividend</b>	
	First request or any such communication with respect to non-receipt of distribution / interest/ dividend will be considered as a query / request if, the InvIT has credited the distribution / interest to the bank account of the Security Holder or dispatched demand drafts on or before the due	Any communication with respect to non-receipt of demand drafts sent to the InvIT or to the RTA after the expiry of the Stipulated Turnaround Time for

	<p>date(s). When the InvIT is unable to pay out the distribution / interest:</p> <ul style="list-style-type: none"> <li>i. In case where the distribution / interest is to be credited to the bank account of the Security Holder, and such credit has been declined by the bank, the InvIT will pay out the distribution / interest/ dividend through a demand draft in favour of the Security Holder.</li> <li>ii. In case the dispatched demand draft is returned undelivered, the InvIT will proceed with re-dispatching the demand draft only upon a written request by the Security Holder. Such communication from the Security Holder will be treated as a request and not a complaint.</li> </ul>	<p>issuance of duplicate demand draft will be considered as complaint.</p>
c.	<b>Others</b>	
	<ul style="list-style-type: none"> <li>i. Correspondence with respect to complete breakup details of Distribution/Interest, Re-processing of distribution/interest/dividend 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 InvIT or its operations as per statutory rights available to the Security Holders will be treated as request if, the requisition is in proper format and the InvIT has responded to the same within prescribed time limits.</li> <li>iv. Incomplete communications, communications without requisite supporting documentation or any communication which is vague or non-specific in nature will not be treated as a complaint.</li> </ul>	<p>Any communication from the Security Holder not responded to by InvIT or RTA or not responded by InvIT or RTA within the Stipulated Turnaround Time will be considered as complaint.</p>

	v. Communications / complaints in relation to matters that are sub- judice will not be treated as a complaint under this Policy.	
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#### E. Investor Grievance Redressal Mechanism

- a. Security Holder can lodge a complaint for non-receipt of any right available to them or failure of the RTA / InvIT to comply with any statutory obligation by giving details of their name, 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 Security Holder by the RTA. Security Holder 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, Security Holder can also lodge their complaints through the InvIT's designated email id for investor grievances i.e. **[grievance@seit.co.in](mailto:grievance@seit.co.in)**. The designated email id is also displayed on the official website.
- d. If the Security Holder does not receive a reply from the RTA within the Stipulated Turnaround Time, he / she may approach the InvIT at the credentials mentioned above. Additionally, Security Holder's are urged to refrain from sending multiple reminders during the above-mentioned turnaround periods for redressal of their complaints.
- e. Only complaints sent on the addresses/email ids mentioned in this Policy will be treated as valid complaints.
- f. The InvIT periodically obtains status report of the complaints from the RTA.
- g. All the investor complaints/grievance received online through "**SEBI Complaints Redress System**" (Scores) are checked regularly and to be resolved within the stipulated timeline under SEBI Circular No. SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023, and SEBI/HO/DDHS/DDHS-PoD-2/P/CIR/2025/89 dated June 12, 2025.
- h. As required under SEBI Circular No. SEBI/HO/DDHS-PoD-2/P/CIR/2025/10 dated July 11, 2025, the InvIT shall file the statement of investor complaints with the Stock Exchanges. Further, InvIT shall also place the statement specified in point g, before the Board of Directors of Investor Manager and Trustee on a quarterly basis for review. Further, the InvIT shall also make annual disclosure of investor complaints in its annual report pursuant to the InvIT Regulations.

- i. The SRC is responsible for the examination and redressal of the complaints by investors.

**F. Contact details**

<b>Registrar and Transfer Agent</b>	The name and contact details of Registrar and Transfer Agent, Compliance Officer, InvIT Trustee and Debenture Trustee are available on the website of the Trust.
<b>Compliance Officer</b>	
<b>InvIT Trustee</b>	
<b>Debt Securities Trustee</b>	

**G. Conflict with Applicable Law**

This Policy shall not contradict with the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, Securities and Exchange Board of India (Infrastructure Investments Trusts) Regulations, 2014, including the Master Circular for Infrastructure Investment Trusts (InvITs) dated July 11, 2025, any amendment or any other circular issued by SEBI from time to time to the extent applicable, or any other applicable law. In case of any discrepancy, the provisions of applicable law shall prevail over the provisions of this Policy.

**H. Amendment**

- (i) Any amendment to this Policy shall be undertaken by the Board of Directors of the Investment Manager, in compliance with applicable law.
- (ii) Notwithstanding the above, this Policy will stand amended to the extent of any change in applicable law, including any amendment to the InvIT Regulations and the SEBI Listing Regulations, without any action from the Investment Manager or approval of the unitholders of the InvIT.

Adopted by the board of directors of Sustainable Energy Infra Investment Managers Private Limited.