



ROADSTAR INFRA INVESTMENT TRUST

INVESTOR GRIEVANCE REDRESSAL POLICY

Investor Grievance Redressal policy

A. 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 Roadstar Infra Investment Trust (the “**Trust**”) in a timely manner.
- b. The coverage of this policy is to redress the grievance of all the securities issued by the Trust, which are proposed to be listed on the stock exchanges in India.
- c. This Policy was approved by the Board of Roadstar Investment Managers Limited (“**Investment Manager**”) in its meeting held on [•].
- d. The Trust has appointed KFIN Technologies 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 security holders related affairs of The Trust.
- e. The Board has appointed the Company Secretary to act as Compliance Officer of The Trust under the SEBI (Infrastructure Investment Trusts) Regulations, 2014 (“**InvIT Regulations**”). As Compliance Officer, the Company Secretary is responsible for ensuring the provision of prompt and effective services to the securityholders and monitoring the dedicated email address of The Trust for investor grievances.

B. DEFINITION

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

- a. “**Board**” means the Board of Directors of Roadstar Investment Managers Limited.
- b. “**Trust**” means Roadstar Infra Investment 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 The Trust; the Securities and Exchange Board of India Act, 1992 read with the rules and regulations made thereunder, including the InvIT Regulations.

C. INVESTOR SERVICE TIMELINES **[Note to Company: Please confirm the timelines]**

The Trust 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. **[Note to Company: Please confirm]**

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.

D. CLASSIFICATION OF SECURITYHOLDER COMMUNICATION

The Trust may receive 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 Trust 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 the Trust's investor-friendly initiatives, the Board has considered it appropriate and desirable to formally document the present guidelines w.r.t classification of securityholders' communication through this Policy. The Trust 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 Trust.

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>
a.	<i>Non-receipt of annual report</i>	
	First request or any such communication w.r.t. non - receipt of annual report will be considered as a request if, the Trust has dispatched the annual report to the securityholder 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. The Trust 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.	Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if, the Trust / RTA has not dispatched the annual report to the securityholder on or before the due date(s), or the Trust / RTA has not responded to securityholder's request within the stipulated turnaround time.
b.	<i>Non-receipt of distribution / interest</i>	
	First request or any such communication w.r.t. 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(s). When the Trust is unable to pay out the distribution / interest: 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 favour of the securityholder. 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. Such communication from the securityholder will be treated as a request and not a complaint.	Any communication w.r.t. 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 prescribed time limits.</p> <p>The Trust 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 Trust 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>Communication w.r.t. 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 has not dispatched the TDS certificates / Form 64B to the securityholder.</p>
d.	<i>Securityholder communication through statutory authorities</i>	
	<p>Any communication from investors through statutory authorities which:</p> <ol style="list-style-type: none"> 1. is not treated as a complaint by the statutory authority, 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 a complaint. 2. 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 Trust within 30 days. Accordingly, such grievances registered with SEBI, will be not treated as complaints by the Trust. 	<p>At times, requests / grievances are directly communicated to the statutory authorities by the investors.</p> <p>Such communications may not always qualify as a complaint under the guidelines adopted by the Trust.</p> <p>However, since the 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 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 Trust.</p>
e.	<i>Others</i>	

	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.	Any communication from the investor not responded to by Trust or RTA or not responded by Trust or RTA within the stipulated turnaround time will be considered as complaint.
	Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.	
	ii. 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 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.	

E. INVESTOR GRIEVANCE REDRESSAL MECHANISM

- a. Investors can lodge a complaint for non-receipt of any right available to them or failure of the RTA / 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 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 Trust's designated email id for investor grievances – [●] or [●]. The designated email ids are also

displayed on the Trust's website. Alternatively, investors can send their complaints at the principal place of business of the Trust.

- d. If the investor does not receive a reply from the RTA within the stipulated turnaround time, he / she may approach the Trust at the credentials mentioned above.
- e. Investors are requested to approach the Trust, 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 Trust periodically obtains status report of the complaints from the RTA.
- h. The Board 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 Trust files with the Stock Exchanges and places the statement of investor complaints at the Board meeting on a quarterly basis. Further, The Trust also submits statement of investor complaints to Trustee of The Trust on a quarterly basis. Further, the Trust also makes annual disclosure of investor complaints in its annual report pursuant to the InvIT Regulations.

F. CONTACT DETAILS [

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

Level 1	[•] [Note to Draft: To be filled in with name, address, phone number, email of relevant contact person]
Level 2	[•] [Note to Draft: To be filled in with name, address, phone number, email of relevant contact person]

Level 3	<p>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.</p> <p>SCORES facility can be accessed through the web link http://scores.gov.in.</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>
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CONTACT DETAILS OF THE RTA

KFin Technologies Limited

Selenium, Tower B
Plot No- 31 and 32, Financial District
Nanakramguda, Serilingampally Mandal,
Hyderabad 500 032
Telangana, India
Tel.: +91 40 6716 2222
Fax number: +91 40 67161563
E-mail: [●]@kfintech.com
Investor Grievance E-mail: einward.ris@kfintech.com
Website: www.kfintech.com
Contact Person: M. Murali Krishna

Unit: [●]

KFin Technologies Limited

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E-mail: [●]@kfintech.com
Investor Grievance E-mail: einward.ris@kfintech.com
Website: www.kfintech.com
Contact Person: M. Murali Krishna

Tel: [●]

H. MISCELLANEOUS

1. Any amendment/variation of this Policy shall require the prior approval of the board of directors of the Investment Manager.
2. Notwithstanding the above, this Policy will stand amended to the extent of any change in applicable law, without the requirement of any further action from the Investment Manager or the Unitholders of the Trust.
3. This Policy shall be effective from [●] and can be modified, withdrawn or suspended by the Trust at its sole discretion without any prior intimation.

Date Adopted	January 25, 2024
Date Last Updated	-