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| <b>DATA LINK INVESTMENT MANAGER PRIVATE LIMITED</b> <i>(formerly known as BIP India Infra Projects Management Services Private Limited)</i> | <b>Policy Ref No.</b>  | Data Link /Policy/001 |
|                                                                                                                                             | <b>Policy Owner</b>    | Data Link Board       |
|                                                                                                                                             | <b>Policy Approver</b> | Data Link SRC         |
|                                                                                                                                             | <b>Date of Issue</b>   | <b>Version</b>        |
|                                                                                                                                             | July 4, 2025           | 1.0                   |

## **Investor Grievance Redressal Policy**

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## PREAMBLE

Data Link Investment Manager Private Limited (formerly known as BIP India Infra Projects Management Services Private Limited) ("Company") is a private limited company incorporated under the Companies Act, 2013. The Company is acting as the Investment Manager of Altius Telecom Infrastructure Trust (formerly known as Data Infrastructure Trust) ("InvIT/Trust/Altius"), infrastructure investment trust registered under the Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014, as amended ("SEBI InvIT Regulations").

The Units and Non-Convertible Debentures of the Trust are listed on BSE Limited ("BSE/Stock Exchange"). The objective of this Investor Grievance Redressal Policy ("the Policy") is to ensure structured, transparent, and timely process for addressing investor complaints and grievances in accordance with the SEBI InvIT Regulations and other applicable laws and regulations.

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 has appointed the Company Secretary of the Company to act as Compliance Officer of the Altius under the InvIT Regulations. The Compliance Officer is responsible for ensuring prompt and effective services to the securityholders and monitoring the dedicated email address of the Trust for investor grievances.

## DEFINITION

- a. **"Board"** shall mean the board of directors of Data Link Investment Manager Private Limited.
- b. **"Compliance Officer"** shall mean the compliance officer of the InvIT.
- c. **"Debt Securities"** shall mean debt securities issued by the Trust.
- d. **"InvIT"** or **"Trust"** or **"Altius"** means Altius Telecom 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. **"BIA"** shall mean Bharat InvITs Association.
- j. **"ODR"** is a is a web based centralized grievance redressal system of SEBI ([www.smartodr.in](http://www.smartodr.in)) portal for harnesses online conciliation and online arbitration for resolution of disputes arising in the Indian Securities Market.

- k. **“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.
- l. **“Units”** shall mean units issued by the InvIT.

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

#### INVESTOR SERVICE TIMELINES

| Particulars                                                              | Timeline                                                                                                                                                                                                                                                      |
|--------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Matters such as non-receipt of annual report and notice of postal ballot | <p>Within a period of 5 working days from the receipt of the request</p> <p>In case, any supporting documents are required by the RTA to address the request, within a period of 5 working days from receipt of such documents to the RTA's satisfaction.</p> |
| Other matters such as distribution/interest, etc.                        | <p>Within a period of 7 to 10 days from receipt of the request</p> <p>In case, any supporting documents are required by the RTA to address the request, within a period of 15 days from the receipt of such documents to the RTA's satisfaction.</p>          |

#### CLASSIFICATION OF SECURITYHOLDER COMMUNICATION

The Trust receives 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. With a view to ensure greater transparency and as a part of Trust's investor-friendly initiatives, the Stakeholders Relationship Committee (“SRC”) has considered it appropriate and desirable to formally document the present guidelines w.r.t classification of securityholders' communication through this Policy between general correspondence, requests, complaints, etc.

##### General Principle guiding classification of securityholders' communication

- 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.
- 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.
- In case of any ambiguity, the Compliance Officer 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.
- For clarity, examples of request v/s complaint / grievance are presented below:

**Classification of securityholders' communication**

| Sr. No. | Communication not treated as complaint                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Communication treated as complaint                                                                                                                                                                                                                                                                                                                |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a.      | <b>Non-receipt of annual report</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                   |
|         | <p>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.</p> <p>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.</p>                                                                                                                                                                                                                                                                                                                                                                                                         | <p>Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if,</p> <p>a. the InvIT / RTA has not dispatched the annual report to the Security Holder on or before the due date(s), or</p> <p>b. the InvIT / RTA has not responded to Security Holder's request within the Stipulated Turnaround Time</p> |
| b.      | <b>Non-receipt of distribution / interest/ dividend</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                   |
|         | <p>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 date(s).</p> <p>When the InvIT is unable to pay out the distribution / interest:</p> <p>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.</p> <p>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.</p> | <p>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 issuance of duplicate demand draft will be considered as complaint.</p>                                                                                                                  |
| c.      | <b>Non-receipt of TDS Certificates / Form 64B</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                   |
|         | <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</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</p>                                                                   |

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|    | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | the TDS certificates / Form 64B to the securityholder.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| d. | <b><i>Securityholder communication through statutory authorities</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|    | <p>Any communication from investors through statutory authorities which:</p> <ol style="list-style-type: none"> <li>is not treated as a complaint by the statutory authority, and</li> <li>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.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>At times, requests / grievances are directly communicated to the 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 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. | <b><i>Others</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|    | <ol style="list-style-type: none"> <li>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>Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.</li> <li>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> </ol> | 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|  | 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.<br>Communications / complaints in relation to matters that are sub-judice will not be treated as a complaint under this Policy. |  |
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#### 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 that 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 – [invitcompliance@altiusinfra.com](mailto:invitcompliance@altiusinfra.com). The designated email id is 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. Additionally, Security Holder's are urged to refrain from sending multiple reminders during the above-mentioned turnaround periods for redressal of their complaints.
- 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 the status report of the complaints from the RTA.
- h. All the investor complaints/grievance received online through "SEBI Complaints Redress System" (Scores) are checked regularly and replied/resolved expeditiously as required under SEBI Circular No. SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023.
- i. The SRC is responsible for the supervision for redressal of the complaints by investors.
- j. The Trust files with the Stock Exchange and place the statement of investor complaints at the Board meeting on a quarterly basis. Further, Trust also submits statement of investor complaints to Trustee of Trust on a quarterly basis. Further, the Trust also makes annual disclosure of investor complaints in its annual report pursuant to the SEBI INVIT Regulations.
- k. The SRC shall meet as often as required under the applicable law to supervise investor's grievances including complaints related to securities, non-receipt of annual report, non-receipt of declared distribution/interest, notice of Security Holder meetings, etc.

## CONTACT DETAILS

|                                          |                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Registrar and Unit Transfer Agent</b> | <b>KFin Technologies Limited</b><br>1 <sup>st</sup> Floor, Selenium, Tower B Plot No- 31 & 32, Financial District Nanakramguda, Serilingampally Hyderabad, Rangareddi 500032 Telangana, India<br>E-mail: <a href="mailto:support.altiusinfra@kfintech.com">support.altiusinfra@kfintech.com</a><br>Website: <a href="http://www.kfintech.com">www.kfintech.com</a><br>Contact: +91 40 7961 5205 |
| <b>Compliance Officer</b>                | <b>Ms. Yesha Maniar</b><br>Principle Place of Business<br>Unit 1, 9 <sup>th</sup> Floor, Tower 4, Equinox Business Park, LBS Marg, Kurla (W), Mumbai - 400070.<br>Email Id: <a href="mailto:invitcompliance@altiusinfra.com">invitcompliance@altiusinfra.com</a><br>Contact: +91 22 6907 5213                                                                                                   |
| <b>InvIT Trustee</b>                     | <b>Axis Trustee Services Limited</b><br>The Ruby, 2 <sup>nd</sup> Floor, SW, 29 Senapati Bapat Marg, Dadar West, Mumbai – 400028<br>E-mail: <a href="mailto:debenturetrustee@axistrustee.com">debenturetrustee@axistrustee.com</a><br>Contact: +91 22623 00451                                                                                                                                  |
| <b>Debenture Trustee</b>                 | <b>Catalyst Trustee Limited</b><br>Unit No. 901, 9 <sup>th</sup> Floor, Tower – B, Peninsula Business Park, Senapati Bapat Marg, Lower Parel (W), Mumbai- 400013<br>E-mail: <a href="mailto:ComplianceCTL-Mumbai@ctltrustee.com">ComplianceCTL-Mumbai@ctltrustee.com</a><br>Website: <a href="http://www.catalysttrustee.com">www.catalysttrustee.com</a>                                       |

## DUTIES OF BHARAT INVITS ASSOCIATION (“BIA”) AS A DESIGNATED BODY FOR REDRESS OF INVESTOR COMPLAINTS

### i. Support Grievance Redressal:

To support grievance redressal in a transparent and efficient manner for all the Stakeholders. They can lodge a grievance against any InvIT industry member by emailing at [bia@bharatinvitsassociation.com](mailto:bia@bharatinvitsassociation.com).

### ii. To act as a Facilitator between the Investors and BIA members:

Facilitate communication between investors and the concerned BIA member in case of disputes.

### iii. Ensuring Timely Resolution:

To monitor all complaints received on the SCORES portal assigned to BIA as a designated body, coordinate with relevant members and ensure that the complaints are resolved within the stipulated timeframe.

## DELEGATION OF AUTHORITY

The Board vide its approval granted on July 4, 2025, has authorized the SRC of the Board of Directors of the Company to review and modify the policy for all future amendments and update the amended policy on the website of the Trust and place before the board, for noting at ensuing meeting held after any modifications in the policy as required from time to time.

## **REVIEW AND AMENDMENTS**

This policy is framed based on the provisions of the applicable laws. In case of any subsequent changes in the applicable laws, which makes any of the provisions in the policy inconsistent with the said applicable laws, then the provisions of the applicable laws would prevail over the policy.

The Stakeholders Relationship Committee of the Company is authorized to amend this policy, as may be required from time to time, to give effect to any such changes/amendments and the amended policy shall be placed before the Board for noting.

## **GENERAL**

The Company Secretary of the Company and Compliance Officer of the Trust is authorized to disseminate this policy and any amendment thereto, on the website of the Trust.

Any questions and clarifications relating to this policy should be addressed to the Company Secretary of the Company and Compliance Officer of the Trust at [invitcompliance@altiusinfra.com](mailto:invitcompliance@altiusinfra.com).

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