

April 21, 2025

To,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001
Maharashtra, India

Sub.: Quarterly Compliance Report on Corporate Governance

Ref.: (1) Regulation 26K of the Securities and Exchange Board of India (Infrastructure Investment Trust) Regulations, 2014
(2) SEBI Master Circular bearing reference no. SEBI/HO/DDHS-PoD-2/P/CIR/2024/44 dated May 15, 2024, as amended
(3) Altius Telecom Infrastructure Trust (formerly known as Data Infrastructure Trust) ("Trust") (Scrip Code: 543225)

Dear Sir/Madam,

Pursuant to Regulation 26K of the SEBI (Infrastructure Investment Trusts) Regulations, 2014 read with SEBI Master circular no. SEBI/HO/DDHS-PoD-2/P/CIR/2024/44, we hereby submit the Compliance Report on Corporate Governance for the Trust for the quarter and financial year ended March 31, 2025.

Further, the same is also available on the website of the Trust i.e. www.altiusinfra.com.

You are requested to kindly take the same on record.

Thanking you,

Yours faithfully,

For **Altius Telecom Infrastructure Trust**
Data Link Investment Manager Private Limited
(formerly known as BIP India Infra Projects Management Services Private Limited)
(acting in its capacity as the Investment Manager of Altius Telecom Infrastructure Trust)



Yesha Maniar
Compliance Officer

Encl: a/a

CC:

Axis Trustee Services Limited
("Trustee of the Trust")
Axis House, Bombay Dyeing Mills Compound,
Pandurang Budhkar Marg,
Worli, Mumbai - 400 025, Maharashtra, India

Catalyst Trusteeship Limited
("Debenture Trustee")
Unit No. 901, 9th Floor, Tower – B,
Peninsula Business Park, Senapati Bapat Marg,
Lower Parel (W), Mumbai- 400013,
Maharashtra, India

Registered Office:

Unit 1, 9th Floor, Tower 4,
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Quarterly Compliance Report on Corporate Governance

(Pursuant to Regulation 26K of the Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014) ("SEBI InvIT Regulations")

1	Name of InvIT:	Altius Telecom Infrastructure Trust (formerly known as Data Infrastructure Trust) ("Trust")
2	Name of the Investment Manager ("IM")	Data Link Investment Manager Private Limited (formerly known as BIP India Infra Projects Management Services Private Limited) ("Data Link") (appointed w.e.f. December 12, 2023)
3	Quarter ending:	March 31, 2025

I. Composition of Board of Directors

Title (Mr./ Ms.)	Name of the Director	DIN	PAN ⁽¹⁾	Category (Chairperson/ Non-Independent/ Independent/ Nominee)	Initial Date of Appointment	Date of Re-appointment	Date of Cessation	Tenure ⁽²⁾ (in months)	No. of directorships in all Managers/Investment Managers of REIT/InvIT and listed entities, including this Investment Manager ⁽³⁾	No. of Independent directorships in all Managers/ Investment Managers of REIT/InvIT and listed entities, including this Investment Manager ⁽³⁾	Number of memberships in Audit/Stakeholder Committee(s) in all Managers/ Investment Managers of REIT/InvIT and listed entities, including this Investment Manager ⁽⁴⁾⁽⁵⁾ (Refer Regulation 26G of the SEBI InvIT Regulations)	Number of posts of Chairperson in Audit/Stakeholder Committee(s) in all Managers/ Investment Managers of REIT/InvIT and listed entities, including this Investment Manager ⁽⁴⁾ (Refer Regulation 26G of the SEBI InvIT Regulations)
Ms.	Pooja Aggarwal	07515355	ADTPA8604L	Non-Independent	December 12, 2023	-	-	-	1	0	2	0
Mr.	Sunil Srivastav	00237564	AAOPSP996H	Independent	December 12, 2023	-	-	15.20	2	2	7	3
Ms.	Radhika Vijay Haribhakti	02409519	AAAPH8250M	Independent	December 12, 2023	-	-	15.20	6	6	9	3
Mr.	Jagdish Ganapathi Kini	00518726	AAAPK9150E	Independent	December 12, 2023	-	-	15.20	1	1	3	1
Ms.	Helly Bharat Ajmera	10240609	ADJPA5432C	Non-Independent	May 17, 2024	-	-	-	2	0	1	0
Mr.	Sian Chuan Jason Chan	02265678	NA ⁽⁶⁾	Non-Independent	May 17, 2024	-	-	-	1	0	0	0
Mr.	Chetan Rameshchandra Desai	03595319	AACPDS693G	Independent	May 17, 2024	-	-	10.15	4	4	8	7
Mr.	Munish Seth	02720293	ABAPS1500Q	Non-Independent- Managing Director	September 2, 2024	-	-	-	1	0	2	0
Mr.	Brigopal Jaju	00061367	AABPJ8195N	Independent	September 7, 2024	-	-	6.24	1	1	1	0
Mr.	Arpit Agrawal	07769740	APKPA2617Q	Chairperson - Non- Independent	September 7, 2024	-	-	-	1	0	0	0

Whether regular Chairperson appointed:

Yes

Whether Chairperson is related to Managing Director or CEO:

No

Notes:

(1) Pursuant to the advisory received from the Trustee of the Trust vide letter dated April 8, 2025, Data Link has been advised to provide the details of PAN of Directors to the Stock Exchange(s) along with the submission of this Report.

(2) In terms of the Master Circular issued by SEBI bearing reference no. SEBI/HO/DDHS-PoD-2/P/CIR/2024/44 dated May 15, 2024, as amended, Tenure is provided only of Independent Directors and reflects total period from which Independent Director is serving on Board of the Investment Manager in continuity without any cooling off period, upto March 31, 2025 or date of cessation, whichever is earlier.

(3) No. of Directorships/Independent Directorships in Managers/Investment Managers of REIT/InvIT and equity listed entities, including this Investment Manager, has been considered for the purpose of disclosure.

(4) Pursuant to Regulation 26G of the SEBI InvIT Regulations, read with provisions of Regulation 26(1) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations"), while calculating the committee positions of the Directors, number of membership/chairpersonship in Audit/ Stakeholders' Relationship Committee(s) in all Managers/Investment Managers of REIT/InvIT (including this Investment Manager), listed and unlisted public companies (including public companies which are high value debt listed entities), has been considered.

(5) Number of memberships in Audit and Stakeholders' Relationship Committee includes chairpersonship, wherever applicable.

(6) Mr. Sian Chuan Jason Chan being a foreign national, PAN is not mentioned.

II. Composition of Committees

Name of Committee	Whether regular Chairperson appointed	Name of Committee members	Category (Chairperson/Non Independent/ Independent/ Nominee)	Date of Appointment	Date of Cessation
Audit Committee	Yes	Mr. Chetan Desai	Chairperson - Independent	May 17, 2024	-
		Ms. Radhika Vijay Haribhakti	Independent	December 12, 2023	-
		Ms. Pooja Aggarwal	Non-Independent	December 12, 2023	-
		Mr. Sunil Srivastav	Independent	December 12, 2023	-
		Mr. Jagdish Ganapathi Kini	Independent	December 12, 2023	-
		Mr. Brigopal Jaju	Independent	September 7, 2024	-
Nomination and Remuneration Committee	Yes	Mr. Jagdish Ganapathi Kini	Chairperson - Independent	December 12, 2023	-
		Mr. Sunil Srivastav	Independent	December 12, 2023	-
		Ms. Radhika Haribhakti	Independent	December 12, 2023	-
		Mr. Chetan Desai	Independent	September 7, 2024	-
Risk Management Committee	Yes	Mr. Munish Seth	Chairperson - Non-Independent - Managing Director	September 2, 2024	-
		Ms. Radhika Haribhakti	Independent	December 12, 2023	-
		Mr. Sunil Panjwani	Chief Risk Officer, Member	August 1, 2024	February 14, 2025
		Mr. Brigopal Jaju	Independent	September 7, 2024	-
		Mr. Chetan Desai	Chairperson - Independent	May 17, 2024	-
Stakeholders' Relationship Committee	Yes	Ms. Radhika Haribhakti	Independent	December 12, 2023	-
		Mr. Munish Seth	Non-Independent- Managing Director	September 2, 2024	-

III. Meeting of Board of Directors

Date(s) of Meeting (if any) in the previous quarter	Date(s) of Meeting (if any) in the relevant quarter	Whether requirement of Quorum met ⁽¹⁾	Number of Directors present ⁽¹⁾	Number of independent directors present ⁽¹⁾	Maximum gap between any two consecutive meetings (in number of days)
17-10-2024	-	-	-	-	-
14-11-2024	-	-	-	-	-
17-12-2024	-	-	-	-	-
-	30-01-2025	Yes	9	5	43
-	18-02-2025	Yes	8	4	18
-	07-03-2025	Yes	10	5	16

Note:

(1) In terms of the Master Circular issued by SEBI bearing reference no. SEBI/HO/DDHS-PoD-2/P/CIR/2024/44 dated May 15, 2024, as amended, this information is to be filled in only for the current quarter meetings.

IV. Meetings of Committees

A. Audit Committee

Date(s) of meeting of the Committee in the relevant quarter ⁽¹⁾	Whether requirement of Quorum met ⁽¹⁾	Number of Directors present ⁽¹⁾	Number of independent directors present ⁽¹⁾	Date(s) of meeting of the Committee in the previous quarter ⁽²⁾	Maximum gap between any two consecutive meetings (in number of days)
-	-	-	-	14-11-2024	-
30-01-2025	Yes	6	6	-	76
07-03-2025	Yes	6	6	-	35

Note:

(1) In terms of the Master Circular issued by SEBI bearing reference no. SEBI/HO/DDHS-PoD-2/P/CIR/2024/44 dated May 15, 2024, as amended, this information is to be filled in only for the current quarter meetings.

B. Nomination and Remuneration Committee

Date(s) of meeting of the Committee in the relevant quarter ⁽¹⁾	Whether requirement of Quorum met ⁽¹⁾	Number of Directors present ⁽¹⁾	Number of independent directors present ⁽¹⁾	Date(s) of meeting of the Committee in the previous quarter ⁽²⁾	Maximum gap between any two consecutive meetings (in number of days)
-	-	-	-	14-11-2024	-
-	-	-	-	17-12-2024	-
30-01-2025	Yes	4	4	-	43
07-03-2025	Yes	4	4	-	35
26-03-2025	Yes	4	4	-	18

Note:

(1) In terms of the Master Circular issued by SEBI bearing reference no. SEBI/HO/DDHS-PoD-2/P/CIR/2024/44 dated May 15, 2024, as amended, this information is to be filled in only for the current quarter meetings.

C. Risk Management Committee

Date(s) of meeting of the Committee in the relevant quarter ⁽¹⁾	Whether requirement of Quorum met ⁽¹⁾	Number of Directors present ⁽¹⁾	Number of independent directors present ⁽¹⁾	Date(s) of meeting of the Committee in the previous quarter ⁽²⁾	Maximum gap between any two consecutive meetings (in number of days)
-	-	-	-	14-11-2024	-
07-03-2025	Yes	3	2	-	112

Note:

(1) In terms of the Master Circular issued by SEBI bearing reference no. SEBI/HO/DDHS-PoD-2/P/CIR/2024/44 dated May 15, 2024, as amended, this information is to be filled in only for the current quarter meetings.

D. Stakeholders' Relationship Committee

Date(s) of meeting of the Committee in the relevant quarter ⁽¹⁾	Whether requirement of Quorum met ⁽¹⁾	Number of Directors present ⁽¹⁾	Number of independent directors present ⁽¹⁾	Date(s) of meeting of the Committee in the previous quarter	Maximum gap between any two consecutive meetings (in number of days)
26-03-2025	Yes	3	2	-	-

Note:

(1) In terms of the Master Circular issued by SEBI bearing reference no. SEBI/HO/DDHS-PoD-2/P/CIR/2024/44 dated May 15, 2024, as amended, this information is to be filled in only for the current quarter meetings.

V. Affirmations

	Affirmations	
1	The composition of Board of Directors is in terms of the SEBI (Infrastructure Investment Trusts) Regulations, 2014.	Yes
2	The composition of the following committees is in terms of the SEBI (Infrastructure Investment Trusts) Regulations, 2014.	
	(a) Audit Committee	Yes
	(b) Nomination and Remuneration Committee	Yes
	(c) Stakeholders' Relationship Committee	Yes
	(d) Risk Management Committee	Yes
3	The committee members have been made aware of their powers, role and responsibilities as specified in the SEBI (Infrastructure Investment Trusts) Regulations, 2014.	Yes
4	The meetings of the board of directors and the above committees have been conducted in the manner as specified in the SEBI (Infrastructure Investment Trusts) Regulations, 2014.	Yes.
5	(a) This report has been placed before Board of Directors of the investment manager. Any comments/observations/advice of the board of directors may be mentioned here.	No. This Report for the quarter ended March 31, 2025 shall be placed before the Board at the ensuing meeting. Further, any comments/observations/advice of the Board on this Report shall be mentioned in the Report for the quarter ended June 30, 2025.
	(b) The report submitted in the previous quarter has been placed before Board of Directors of the investment manager. Any comments/observations/ advice of the board of directors may be mentioned here.	Yes. The Report for the quarter ended December 31, 2024 was placed before the Board at its meeting held on January 30, 2025 and the Board had no observation/ comment/advice on the said Report.

VI. Disclosure on website of Invited

Item	Compliance Status	If Yes provide link to website. If No/NA provide reasons
a) Details of business	Yes	https://www.altiusinfra.com/about
b) Financial information including complete copy of the Annual Report including Balance Sheet, Profit and Loss Account, etc.	Yes	https://www.altiusinfra.com/investors/altius#financial-results
c) Contact information of the designated officials of the company who are responsible for assisting and handling investor grievances	Yes	https://www.altiusinfra.com/contact
d) Email ID for grievance redressal and other relevant details	Yes	https://www.altiusinfra.com/contact
e) Information, report, notices, call letters, circulars, proceedings, etc. concerning units	Yes	https://www.altiusinfra.com/investors/altius#corporate-announcements
f) All information and reports including compliance reports filed by InvIT with respect to units	Yes	https://www.altiusinfra.com/investors/altius#corporate-announcements
g) All intimations and announcements made by InvIT to the stock exchanges	Yes	https://www.altiusinfra.com/investors/altius#corporate-announcements
h) All complaints including SCORES complaints received by the InvIT	Yes	https://www.altiusinfra.com/investors/altius#corporate-announcements
i) Any other information which may be relevant for the investors	Yes	https://www.altiusinfra.com/investors/altius#corporate-announcements
It is certified that these contents on the website of the Trust are correct.		

VI. Annual Affirmations:

Particulars	Regulation Number	Compliance status (Yes/No/NA)
Independent director(s) have been appointed in terms of specified criteria of 'Independence' and / or 'eligibility'	2(1)(sa)	Yes
Board composition	4(2)(e)(v), 26G, 26H(1)	Yes
Meeting of board of directors	26G	Yes
Quorum of board meeting	26H(2)	Yes
Review of Compliance Reports	26H(3)	Yes
Plans for orderly succession for Appointments	26G	Yes
Code of Conduct	26G	Yes
Minimum Information	26H(4)	Yes
Compliance Certificate	26H(5)	Yes
Risk Assessment & Management	26G	Yes
Performance Evaluation of Independent Directors	26G	Yes
Recommendation of Board	26H(6)	Yes
Composition of Audit Committee	26G	Yes
Meeting of Audit Committee	26G	Yes
Composition of Nomination & Remuneration Committee	26G	Yes
Quorum of Nomination and Remuneration Committee meeting	26G	Yes
Meeting of Nomination & Remuneration Committee	26G	Yes
Composition of Stakeholder Relationship Committee	26G	Yes
Meeting of Stakeholder Relationship Committee	26G	Yes
Composition and role of Risk Management Committee	26G	Yes
Meeting of Risk Management Committee	26G	Yes
Vigil Mechanism	26I	Yes
Approval for related party Transactions	19(3), 22(4)(a)	Yes
Disclosure of related party transactions	19(2)	Yes
Annual Secretarial Compliance Report	26J	Yes
Alternate Director to Independent Director	26G	Yes
Maximum Tenure of Independent Director	26G	Yes
Meeting of independent directors	26G	Yes
Familiarization of independent directors	26G	Yes
Declaration from Independent Director	26G	Yes
Directors and Officers insurance	26G	Yes
Memberships in Committees	26G	Yes
Affirmation with compliance to code of conduct from members of Board of Directors and Senior management	26G	Yes
Policy with respect to Obligations of directors and senior management	26G	Yes

For Altius Telecom Infrastructure Trust
Data Link Investment Manager Private Limited
(formerly known as BIP India Infra Projects Management Services Private Limited)
(acting in its capacity as the investment manager of Altius Telecom Infrastructure Trust)



Yesha Maniar
Compliance Officer

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