

May 29, 2025

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

Sub.: Annual Secretarial Compliance Report for the financial year ended on March 31, 2025

Ref.: (1) Regulation 26J 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
(3) Altius Telecom Infrastructure Trust (formerly known as Data Infrastructure Trust) ("Trust") (Scrip Code 543225)

Dear Sir/Madam,

Pursuant to Regulation 26J of the SEBI (Infrastructure Investment Trusts) Regulations, 2014 read with SEBI Master circular no. SEBI/HO/DDHS-PoD-2/P/CIR/2024/44 dated May 15, 2024, as amended, we hereby submit the Annual Secretarial Compliance Report of the Trust for the financial year ended on March 31, 2025, issued by M/s. MMJB & Associates LLP, Practicing Company Secretaries, Mumbai.

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,

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, P B Marg, Worli,
Mumbai-400025, 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

MMJB & Associates LLP

Company Secretaries

803-804, 8th Floor, Ecstasy, Citi of Joy, JSD Road, Mulund West, Mumbai - 400080, (T) 022-31008600
LLPIN: AAR-9997

Secretarial Compliance Report of Altius Telecom Infrastructure Limited (formerly known as Data Infrastructure Trust)

{Acting through its Investment Manager - Data Link Investment Manager Private Limited (formerly known as BIP India Infra Projects Management Services Private Limited)}

For the year ended March 31, 2025

We, MMJB & Associates LLP, Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **Data Link Investment Manager Private Limited (formerly known as BIP India Infra Projects Management Services Private Limited)** ("the Investment manager")
- (b) the filings/submissions made by the investment manager to the Stock Exchanges,
- (c) website of the **Altius Telecom Infrastructure Trust (formerly known as Data Infrastructure Trust)** ("the InvIT"),
- (d) any other document/filing, as may be relevant, which has been relied upon to make this certification, for the year ended March 31, 2025 ('Review Period') in respect of compliance with the provisions of:
 - i. the Securities and Exchange Board of India Act, 1992 ('SEBI Act') and the Regulations, circulars, guidelines issued thereunder; and
 - ii. the Securities Contracts (Regulation) Act, 1956 ('SCRA'), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ('SEBI');

The specific Regulations, whose provisions and the circulars/guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014 (herein after InvIT Regulations);
- (b) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 to the extent applicable to the InvIT;



(c) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;

(d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

and circulars/ guidelines issued thereunder;

Based on above examination, we hereby report that, during the review period:

(a) The Investment Manager of the InvIT has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
Not Applicable			

(b) The Investment manager of the InvIT has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.

(c) The following are the details of actions taken against the InvIT, parties to the InvIT, its promoters, directors either by SEBI or by Stock Exchanges (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
Action taken against Trustee to the InvIT				
1	SEBI	Action in relation to inspection of Axis Trustee Services Limited for the inspection period from July 01, 2021 to August 30, 2023.	Administrative warning, Deficiency Letter, Advisory issued vide letter dated June 28, 2024.	The Trustee has provided limited details, due to which specific information is not mentioned.
2	SEBI	Action in relation to examination with respect to recording and verification of Cash flow information in the Securities and Covenant	Administrative warning issued vide letter dated November 14, 2024.	The Trustee has provided limited details, due to which specific information is not mentioned.



		Monitoring System by Axis Trustee Services Limited for the secured listed ISINs.		
3	SEBI	Action in relation to inspection of Axis Trustee Services Limited for the inspection period from September 01, 2023 to April 30, 2024	Administrative warning, Deficiency, Advisory issued vide letter dated March 17, 2025.	The Trustee has provided limited details, due to which specific information is not mentioned.
4	SEBI	Action in relation to inspection of Axis Trustee Services Limited with respect to thematic inspection for Event of Defaults	Administrative warning issued vide letter dated March 18, 2025.	The Trustee has provided limited details, due to which specific information is not mentioned.
5	SEBI	Action in relation to inspection of REIT Client of Axis Trustee Services Limited	Administrative warning and advisory issued vide letter dated March 24, 2025.	The Trustee has provided limited details, due to which specific information is not mentioned.
6	SEBI	Action in relation to inspection of InvIT Client of Axis Trustee Services Limited	Administrative warning and advisory issued vide letter dated March 28, 2025.	The Trustee has provided limited details, due to which specific information is not mentioned.
7	SEBI	Action in relation to inspection of InvIT Client of Axis Trustee Services Limited	Administrative, Deficiency and Advisory issued vide letter dated March 28, 2025.	The Trustee has provided limited details, due to which specific information is not mentioned.
8	SEBI	Action in relation to inspection of REIT Client of Axis Trustee Services Limited	Administrative warning and advisory issued vide letter dated March 28, 2025.	The Trustee has provided limited details, due to which specific information is not mentioned.
9	SEBI	Action in relation to inspection of InvIT Client of Axis Trustee Services Limited	Administrative warning issued vide letter dated March 28, 2025.	The Trustee has provided limited details, due to which specific information is not mentioned.

(d) The investment manager of the InvIT has taken following actions to comply with the observations made in previous reports:



Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended...	Actions taken by the Investment Manager, if any	Comments of the Practicing Company Secretary on the actions taken by the InvIT
1.	As per Regulation 26K of the InvIT Regulations, Corporate Governance Report is required to be submitted within twenty-one days from the end of the quarter to the Stock Exchanges. However, for quarter ended June 2023 the report was submitted on July 22, 2023 with a delay of 37 Minutes. As per informed by the management, the marginal delay was on account of technical challenge.	2023-2024	The Investment Manager has submitted compliance report on corporate governance in the format as may be specified by the Board, to the recognized stock exchange(s) within twenty-one days from the end of each quarter.	During the Financial Year 2024-25, the Investment Manager has submitted all the compliance report on corporate governance within twenty-one days from end of each quarter to the stock exchange.

For MMJB & Associates LLP
Company Secretaries
ICSI UIN: L2020MH006700
Peer Review Cert. No.: 2826/2022


Deepti Kulkarni
Designated Partner

ACS No. A34733

CP No. 22502

UDIN: A034733G000381992



Date: May 19, 2025

Place: Mumbai