

Annexure 2: Grievance Redressal Policy

1. PURPOSE

- 2.1. Redressal of Grievances of Stakeholders is a vital element for sustained business growth and we want to ensure that our Stakeholders receive exemplary service across different touch points of the fund cycle. Prompt and efficient service is essential to retaining existing relationships and therefore Stakeholder satisfaction becomes critical to us.

2. EFFECTIVE DATE

- 2.1. The Grievance redressal policy shall be effective from 8th December 2020.

3. SCOPE OF THE POLICY

- 3.1. This policy sets out the Grievance Redressal Policy (“**Policy**”) that will be followed by the Company in the event of Grievance. The process as set out hereinbelow is in consonance with the Applicable Law, including but not limited to the Companies Act.
- 3.2. Grievances under this Policy means and includes Stakeholder Grievances (“**Grievances**”). Stakeholder Grievances under this Policy shall mean any and all Grievances related to the environmental or social aspects of the operations of the Company (“**Stakeholder Grievance**”).
- 3.3. Stakeholder Grievances constitute an important voice of the Stakeholders, and this Policy details grievance handling through structured Grievance redressal mechanisms. The Grievance redressal mechanism is supported by a review mechanism, to minimize the recurrence of similar issues in future.

4. KEY DEFINITIONS

In this Policy, unless repugnant to the subject or context of its usage, the following expressions shall carry meanings assigned to them, namely:

“**Applicable Law**” means all applicable statutes, enactments, laws, ordinances, by-laws, rules, regulations, guidelines, notifications, notices, and / or judgments, decrees, injunctions, writs or orders of any court, statutory or regulatory authority, tribunal, board or stock exchange in any jurisdiction, including but not limited to the Companies Act;

“**Business Day**” shall mean a day (other than Saturday, and Sunday and a public holiday) on which scheduled commercial banks are open for normal banking business in New Delhi, India and Mumbai, India.

“**Companies Act**” means the Companies Act, 2013 (to the extent applicable as on relevant date) and shall include all amendments, modifications and re-enactments of the foregoing, together with the rules, regulations and notifications;

“**Company**” means Athaang Infrastructure Private Limited;

“**Compliance Officer**” shall mean officer responsible for overseeing and discharging the compliance requirements of the Company;

“**Policy**” shall mean this Grievance Redressal Policy;

“**Portfolio Fund**” means National Investment and Infrastructure Fund;

“**Stakeholder**” means any person or institution that can affect, be affected by or a decision or activity or project of the Company or the Portfolio Fund and shall include but not be limited to their customers, communities, suppliers, regulators, non-governmental organizations, investors and employees.

5. GRIEVANCE REDRESSAL FRAMEWORK FOR OTHER STAKEHODLERS

5.1. The Company is committed to ensuring that all Stakeholder Grievances are resolved to the satisfaction of the Stakeholders. The Company shall ensure that adequate Grievance redressal mechanisms have been created to resolve all Stakeholder Grievances promptly and effectively. The procedure to be followed by the Stakeholders has been detailed in paragraphs 5.2 below.

5.2. Stakeholder Grievance redressal

The Grievance redressal mechanism of the Company shall provide for an appropriate procedure to receive, make a record of the Stakeholder Grievance and acknowledge the same in a timely manner informing the aggrieved Stakeholder of the indicative timelines for the redressal of the Stakeholder Grievance. The Company shall endeavor to address and resolve the Stakeholder Grievance within 10 (ten) Business Days from receiving the Grievance. Further, the Grievance redressal mechanism shall provide for effective measures to be taken to actively review and resolve the Stakeholder Grievances brought to its attention.

In case, the aggrieved party is not satisfied with the resolution by the Company, the same may be brought to the Portfolio Fund, for final resolution of the Stakeholder Grievance.

The Compliance Officer shall monitor the status of and the timely resolution of the Stakeholder Grievances brought to the attention of the Company.

The Company shall display the Grievance redressal mechanism established by them on their websites if any or displayed prominently at the offices of the Company.

6. REVIEW OF POLICY

6.1. This Policy may be amended and modified to introduce any changes as may be required due to any changes in Applicable Law or changes in the business or the business environment of the Company.