# POLICY ON INVESTOR GRIEVANCE REDRESSAL MECHANISM

# OF

# SEMBCORP GREEN INFRA LIMITED

## INDEX

## 1) Introduction:

Sembcorp Green Infra Limited (Formerly known as Sembcorp Green Infra Private Limited) ("SGIL" or "the Company") believes that Investor service is a vital element for sustained business growth and for better corporate governance. The Company's approach is to treat and service all the investors consistently and fairly. The Company endeavours to address all grievances/ complaints, in a reasonable time and satisfactory manner. Investor grievances/ complaints constitute an important voice of Investor and thus a structured grievance redressal framework is important.

Grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in future. The Company realizes that quick and effective handling and resolution of Investors' grievances is essential. This mechanism shall ensure that all grievances/ complaints shall be heard and the response would be sent for such grievances/ complaints.

The Investor Redressal Mechanism of the Company is based on the following principles:

a) Investors are treated fairly at all times.
b) Grievances/ complaints raised by Investors are dealt with courtesy and in a timely manner.
c) Grievances/ complaints are treated efficiently and fairly.
d) The employees and management of the Company work in good faith and towards the interests of the Investors.

The Mechanism shall become applicable upon listing of the Company's securities and shall thereafter be implemented in full compliance with applicable regulations of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time except for such requirements as may be applicable on a Company which is in process of filling draft offer documents or offer document.

## 2) Applicability and Objective:

SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 as amended from time to time mandates implementation of Investor Grievance Mechanism by all the listed entity to address the complaints / grievances of any of its investors. Accordingly, in view of the regulatory requirement and to ensure prompt resolution, the Company has laid down the appropriate Grievance Redressal Mechanism to resolve grievances / complaints of its investors.

All the investor grievances / complaints registered with the Company shall be reviewed, monitored and resolved in compliance with the provisions of the applicable laws. The focus shall be, to ensure all grievances are resolved in a timely basis and to the full satisfaction of the investors.

The Company has designated the Investor Grievance Redressal Officer appointed under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, who can be approached in case of any grievance / complaint.

## 3) Definition:

a) "Act" means Securities and Exchange Board of India Act, 1992, as amended from time to time.
b) "Board" means Board of Directors of the Company.
c) "Company" means Sembcorp Green Infra Limited.
d) "Grievance" means any written grievance or complaint related to any of the securities of the Company and / or specified in "Annexure I" of this Mechanism.
e) "Investor" includes any investor in the securities of the Company as well as potential investor who has applied/ submitted application for subscribing the securities issued by the Company.
f) "Investor Grievance Redressal Officer" means the Compliance Officer appointed under the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

g) "SEBI Listing Regulations" means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.
h) "Mechanism" means this Investor Grievance Redressal Mechanism of the Company.
i) "SEBI" means Securities and Exchange Board of India.

Wherever appropriate in this Mechanism, a singular term shall be construed to mean the plural where necessary and a plural term the singular. Similarly, any masculine term shall also be construed to mean the feminine or any other gender and vice versa.

Words or phrases not defined above or anywhere in this Mechanism shall have same meaning ascribed to them under the Act or Listing Regulations or Circulars notified by SEBI.

**4) Steps for handling Investor Grievances**

a) The procedure and actions mentioned in this mechanism shall only be applicable for categories of complaints listed in "Annexure I". The details of the Online Redressal Mechanism and the process flow are provided in "Annexure II". The details of the actions against listed companies in case of any failure to redress investor grievances received through SCORES or such other electronic platform or system of the SEBI as shall be mandated from time to time, in order to handle investor complaints electronically in the manner specified by the SEBI and the grievance remains pending beyond 60 days by the Company are provided in "Annexure III".

b) The Company has a designated email id i.e. Investors.India@sembcorp.com for handling investor grievances on which investors can submit his / her grievances / complaints in the format provided in "Annexure IV". The contact details of the Investor Grievance Redressal Officer and in case of escalation, the contact details of the Managing Director along with and the Complaint / Grievance Form is available on the website of the Company (https://www.sembcorpindia.com).

c) Notwithstanding the availability of offline or direct modes of communication with the Company, investors are required to mandatorily lodge their grievances on the SEBI Complaint Redressal System (SCORES) after approaching the Company, in accordance with SEBI circulars issued from time to time. Grievances received through SCORES shall be treated as the primary and governing complaints for regulatory reporting and monitoring purposes.

d) Also, an Investor shall make a written grievances / complaints marking it to the Investor Grievance Redressal Officer, Sembcorp Green Infra Limited, Building 7A – Level 5, DLF Cybercity, Gurugram, Haryana – 122002.

e) The Investor Grievance Redressal Officer tracks the grievances/ complaints received on the designated e-mail ID or through any other mode on a regular basis. The said compliant/ grievance shall be resolved within 21 calendar days from the day of receipt of complaint.

f) The investors wish to lodge a complaint on SCORES (complainant) are required to register themselves on SCORES portal of SEBI by clicking on "Sign up" and selecting the option of "Investor". While filing the registration form, details like Name of the investor, Permanent Account Number (PAN), contact details, email id, etc. are required to be provided.

g) The complainant may use SCORES portal to submit the complaint or grievance directly to the Company under the category "Listed Company- Equity Issue" and selecting the company name.

h) In order to enhance ease, speed and accuracy in the redressal of grievance, the complaint shall be lodged on SCORES within one year from the date of cause of action, where the Complainant approached the Company for redressal of the complaint and the Company rejected the complaint or the complainant has not received any reply from the Company or the complainant is not satisfied with the reply received or the redressal by the Company.

i) The investor may contact the Investor Associations (IAs) recognized by SEBI for any assistance in filing complaints on SCORES portal. The list of IAs is available on SEBI website (www.sebi.gov.in) (Path – Home » Intermediaries/ Market Infrastructure Institutions » Recognised Intermediaries » Recognised Investors Associations). Investors may also seek assistance in filing complaints on SCORES portal from SEBIs toll free helpline number 1800 266 7575.

j) The investor may also approach and submit the grievance / complaint to the Registrar & Transfer Agent and Debenture Trustee & Security Trustee of the Company. Below given contact details.

k) The Compliance officer of the Company shall be responsible for monitoring email address of grievance redressal division as designated by the Company for the purpose of registering complaints by investors.

**REGISTRAR & SHARE TRANSFER AGENT**

**MUFG Intime India Private Limited**
**(*Formerly Link Intime India Private Limited*)**
C-101, Embassy, 247, L.B.S. Marg,
Vikhroli (West) Mumbai – 400083,
Maharashtra, India

**Tel**: +91 810 811 4949
**Email:** sembcorp.ipo@in.mpms.mufg.com

l) The Investor Grievance Redressal Officer gathers all information available on the grievance / complaint which are considered necessary for a proper investigation. He looks into all the necessary information and undertakes to resolve them as soon as possible.

m) To enhance investor satisfaction on complaint redressal, 'First & Second Review' is also available under online resolution mechanism, wherein a complainant, if not satisfied with the redressal of grievance by the Company & opts for review within 15 calendar days from the receipt of Action Taken Report (“ATR”) from the Company / Designated body or there is no response from the Company / Designated body within the stipulated timeline.

n) For any failure to redress investor grievances received through SCORES and remains pending beyond 60 days by the Company, appropriate actions as specified in “Annexure III” shall be taken.

o) The Board of the Company shall review the status of the grievances/ complaints on a quarterly basis and the Company shall file with the recognised stock exchange(s) on a quarterly basis a statement detailing the redressal of investor grievances in such form and within the timelines as may be specified by the Board from time to time.

**5) Resolution mechanism for offline complaints:**

Any investor wishes to report any grievance/ complaint shall submit the same on the below given email ids in the prescribed format as specified in “Annexure IV”.

a) In case of any complaint/ grievance, the Investors can write to:

**Investor Grievance Redressal Officer**

Sembcorp Green Infra Limited,
Building 7A – Level 5, DLF Cybercity, Gurugram, Haryana – 122002
Phone No.: +91 124-6986700
Email Id: Investors.India@sembcorp.com

b) If not satisfied with the response of the Investor Grievance Redressal Officer, the Investors can write to:

**Managing Director**
Sembcorp Green Infra Limited,
Building 7A – Level 5, DLF Cybercity, Gurugram, Haryana – 122002
Phone No.: +91 120-6986675
Email Id: Complianceofficer.India@sembcorp.com

The Company shall provide the resolution within 21 calendar days from the receipt of complaint / grievance from the investor.

**6) Resolution mechanism for online complaints through SCORES:**

a) In case Investors do not receive a resolution within 21 calendar days from the date of submission of the complaint or not satisfied with the resolution or wish to submit an online complaint, they can submit the compliant/ grievance through the SCORES portal at https://scores.sebi.gov.in

b) Upon receipt of a complaint through SCORES, the Company shall resolve the grievance and upload an Action Taken Report (ATR) on the SCORES portal within 21 calendar days. The ATR so uploaded shall be deemed to be the Company's official response and shall be automatically routed to the complainant and the Designated Body.

c) The given complaint shall be simultaneously forwarded to Designated Body, i.e., Stock Exchange. The Designated Body to ensure that the Company shall submit the ATRs with the stipulated timeline.

d) **First review**

Where the Company fails to submit the ATR within 21 calendar days or the complainant seeks review within 15 calendar days of receipt of the ATR, the Designated Body shall undertake a first review and require submission of revised ATR within the stipulated timeline.

e) **Second review**

Where the complainant is dissatisfied with the outcome of the first review or where the Designated Body fails to act within prescribed timelines, SEBI may undertake a second review. The complaint shall be treated as resolved only upon disposal by SEBI in SCORES.

**7) Initiation of the dispute resolution process through the Online Dispute Resolution ("ODR") portal**

After exhaustion of the grievance redressal process on SCORES, eligible investors may initiate dispute resolution through the SEBI recognised Online Dispute Resolution platform, namely SMART-ODR (https://smartodr.in), in accordance with SEBI guidelines.

The dispute resolution through the SMART-ODR Portal cannot be initiated when the complaint / dispute:

a) is under consideration in terms of the paragraph 5 or paragraph 6 above;
b) is under consideration as per SCORES guidelines;

c) is pending before any arbitral process, court, tribunal or consumer forum;
d) is non-arbitrable in terms of Indian law (including when moratorium under the Insolvency and Bankruptcy Code is in operation due to the insolvency process or if liquidation or winding up process has been commenced against the Company);
e) is against the Government of India / President of India or a State Government / Governor of a State.

In case the Client opts for Online Dispute Resolution mechanism or other appropriate civil remedies while the complaint is pending on SCORES portal, the pending complaint shall be treated as disposed on SCORES.

**8) Stakeholders Relationship Committee:**

The Stakeholders Relationship Committee shall place before the Board, at least quarterly, a detailed statement of investor grievances including complaints received, resolved, pending, ageing analysis, and SCORES compliance status, in accordance with the SEBI LODR Master Circular.

A report about the complaints/ grievances covering complaints received, resolved and outstanding as at the end of the quarter shall be placed before the said Committee for deliberation. In case of any delay in resolution process, the same shall be brought to the notice of the Committee on immediate basis.

**9) Review and Amendment:**

The Company shall reserve the rights to review and make amendment to the Policy from time to time as it deems fit in accordance with the applicable laws, rules and regulations for the time being in force. In the event of any conflict between the provisions of this Policy and the Act or Regulations or Rules or any other statutory enactments, the provisions of such Act or Regulations or Rules or statutory enactments shall prevail over this Policy. An interim review and amendment can also be carried out to accommodate minor changes, if any, on regulatory and operating front by the Compliance Officer of the Company.

Important links:

SEBI SCORES https://scores.sebi.gov.in/scores-home

SMART ODR https://smartodr.in/login

**********

**Version Control:**

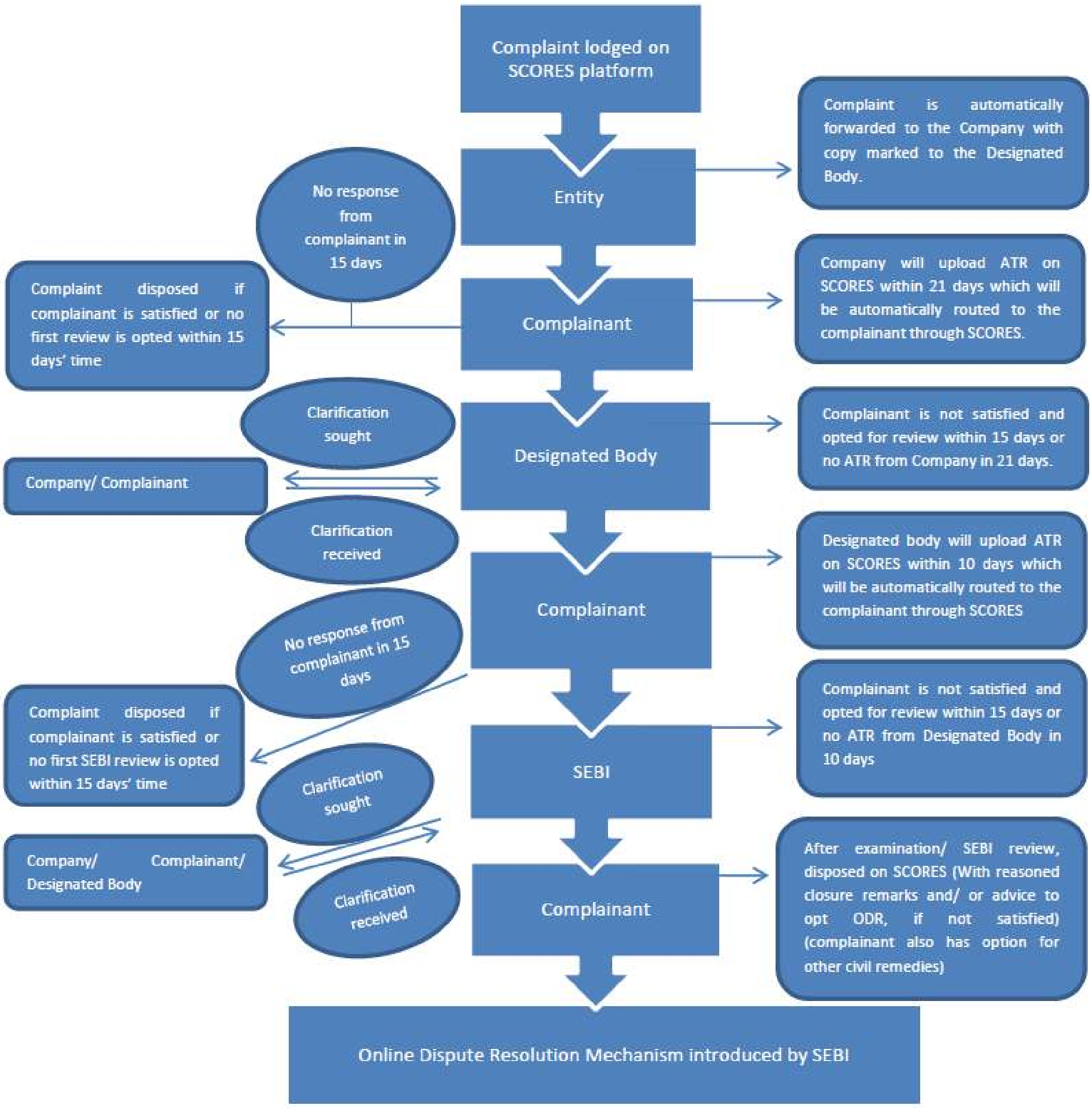
| Sr. No. | Version No. | Date of approval |
|---|---|---|
| 1 | V-1 | 29th July 2026 |

## Annexure I - "Nature of Complaints"

1. Non updation of address /Signature or Corrections etc
2. Non-receipt of Bonus
3. Non receipt of Dividend
4. Non-receipt of duplicate share certificate
5. Non receipt of fractional entitlement
6. Non receipt of interest for delay in dividend
7. Non receipt of interest for delay in refunds
8. Non receipt of interest on securities
9. Non receipt of refund in Public/ Rights issue
10. Non receipt of Rights Issue form
11. Non receipt of securities after conversion/ endorsement/ consolidation/ splitting
12. Non receipt of securities after transfer
13. Non receipt of securities in public/ rights issue
14. Non receipt of shares after conversion/ endorsement/ consolidation/ splitting
15. Non receipt of shares after transfer
16. Non receipt of shares after transmission
17. Non receipt of shares in public/ rights issue (including allotment letter)
18. Non-receipt of interest for delay in dispatch/credit of securities
19. Receipt of refund/ dividend in physical mode instead of electronic mode
20. Receipt of shares in physical mode instead of electronic mode
21. Demat/ Remat
22. Complaints of any other nature as may be notified under applicable regulations from time to time

All investor service requests relating to issue, transfer, transmission, consolidation, split, renewal or issuance of duplicate securities shall be processed only in dematerialised form and completed within timelines prescribed under the SEBI (LODR) Regulations, as amended.

## Annexure II - "Online Redressal Mechanism"



## Annexure III - "Actions in case of non-compliances"

| Sr. No. | Activity | No. of calendar days |
|---|---|---|
| 1. | Complaint handling: | |
| a. | Complaint received in SCORES by the listed company | T |
| 2. | Action in case of non-compliances: | |
| a. | Notice to Listed company intimating the fine @ INR 1000/- per day, per complaint to be levied for not resolving the complaints within 60 days | T+61 |
| b. | Notice to Promoters for non-resolution of complaints and non-payment of fine to the stock exchange. | T+76 |
| c. | Freezing of promoters shareholdings (i.e. entire shareholding of the promoter(s) in listed company as well as all other securities held in the demat account of the promoter(s)) in demat account. | T+86 |
| d. | Stock exchanges may take any other actions, as deemed appropriate. | |
| e. | Once Stock exchange has exhausted all options and yet the number of pending complaints exceed 20 or the value involved is more than INR 10 lakhs, the Exchange to forward the details of such Listed companies to SEBI for further action, if any | |

## Annexure IV - "Complaint/ Grievance Form"

| | |
|---|---|
| **Name of the Investor/ Complainant** | |
| **Permanent Account Number ("PAN")** | |
| **DP & Client ID/ Folio Number** | |
| **Communication address** | |
| **Mobile Number** | |
| **Email Address** | |
| **ISIN of the Securities** | |
| **Details about the complaint/ grievance** | |
| **Attachments, if any** | |

***Note:***

1. ***All the fields are mandatory, until specified otherwise***
2. ***The Company shall promptly respond to the investor/ complainant confirming the receipt of grievance/*** **compliant**