

## INVESTOR GRIEVANCE REDRESSAL POLICY

### 1. OBJECTIVE AND PURPOSE:

This IGR Policy is formulated to ensure efficient services to the Investors of Mindspace REIT (“**Unitholders/ Investors**”) and to effectively address their grievances, if any, in a timely manner.

In terms of Securities and Exchange Board of India (Real Estate Investment Trusts) Regulations, 2014 (“**REIT Regulations**”), the manager of Mindspace REIT is required to ensure adequate and timely redressal of all Unitholders' grievances pertaining to activities of Mindspace REIT.

### 2. DEFINITIONS:

“**Applicable Law**” means any statute, law, regulation, ordinance, rule, judgement, order, decree, bye-law, approval of any Governmental Agency, directive, guideline, policy, requirement or other government restriction or any similar form of decision of or determination by, or any interpretation having the force of law of any of the foregoing Governmental Agency having jurisdiction, applicable to any Party, in force from time to time, including but not limited to the REIT Regulations;

“**Governing Board**” shall mean the governing board of the Manager;

“**REIT Regulations**” shall mean SEBI (Real Estate Investment Trusts) Regulations, 2014, as amended from time to time and circulars, guidelines and notifications issued by the Securities and Exchange Board of time to time.

“**Offer**” shall mean the initial offer of Units to public by Mindspace REIT.

“**SEBI**” shall mean Securities and Exchange Board of India.

“**Stock Exchanges**” shall mean BSE Limited and the National Stock Exchange of India Limited

“**Trustee**” shall mean Axis Trustee Services Limited or such other Trustee as appointed by Mindspace REIT.

“**Unit**” shall mean an undivided beneficial interest in Mindspace REIT, and such Units together represent the entire beneficial interest in Mindspace REIT.

“**Unitholder/Investor**” shall mean any person who holds any Unit of Mindspace REIT or who invests through units in Mindspace REIT.

### 3. RIGHTS OF UNITHOLDERS:

Mindspace REIT shall, for the benefit of its Unitholders, create a two-way channel of communication wherein while Mindspace REIT shall send various communication to the Unitholders such as information of meeting of Unitholders, intimation of distribution, transfer/ transmission of units and other applicable communication, it will also encourage the Unitholders to reach out to Mindspace REIT with their information requirement or grievances, if any. Mindspace REIT shall ensure to have a system wherein all kinds of communication received from the Investors are responded timely and adequately.

#### **4. REDRESSAL OF GRIEVANCES:**

- a. The Manager shall require the registrar and transfer agent of Mindspace REIT to have a dedicated e-mail id wherein the Investors can send their communication seeking information / raising grievances.
- b. The Manager shall also have a dedicated e-mail id wherein the Investors can forward their communication seeking information / raising grievances. The Manager shall depute an executive to monitor the queries / complaints of the Investors.
- c. The Manager shall ensure to register Mindspace REIT on SEBI SCORES platform or such other electronic platform or system as may be introduced by SEBI from time to time to enable the Investors to raise their grievances / complaints electronically.
- d. The Manager shall constitute Stakeholders' Relationship Committee of Mindspace REIT to review the Investors complaints and to ensure timely redressal.
- e. The Governing Board shall conduct themselves in an absolutely fair and transparent manner, adopt high ethical standards and act in the best interest of the Investors of Mindspace REIT.
- f. The Manager shall file with the recognized Stock Exchange(s) on a quarterly basis, a statement furnishing details of the number of complaints received from Investors of Mindspace REIT pending at the beginning of the quarter, received during the quarter, disposed of during the quarter and the number of complaints remaining unresolved at the end of the quarter. The Manager shall also ensure to place the said information at meetings of its Governing Board and share the said information with the Trustee of Mindspace REIT. Further, Mindspace REIT shall also make annual disclosures of the statement of investor complaints, if any, in its annual Report.
- g. The Manager shall endeavour redressal of routine investor grievances within 15 (fifteen) working days from the date of receipt of the complaint. In case of non –routine complaints and complaints where external agencies are involved, Manager may seek to redress complaints as expeditiously as possible.
- h. The Manager shall maintain a functional website of Mindspace REIT wherein the contents of the said website should be kept periodically updated and the website shall provide complete contact details including email id for grievance redressal and other relevant details of the person designated for handling of Investors' grievances.
- i. The Manager shall maintain records pertaining to Investor grievances and actions taken thereon including copies of correspondences made with SEBI if any, for a period of not less than 7 years.
- j. The Manager shall devise an effective whistle blower mechanism enabling Investors, including individual employees and their representative bodies, to freely communicate their concerns about illegal or unethical practices.
- k. The Trustee shall periodically review the status of Unitholders' complaints and their redressal undertaken by the Manager.

**5. GENERAL**

This Policy, as and when required, shall be reviewed and amended by the Governing Board. In the event of any conflict / inconsistency between this Policy and any Applicable Law, the provisions of the Applicable Law shall prevail to the extent of conflict / inconsistency and the provisions of the Applicable Law shall be deemed to have been incorporated until the formal modification of the Policy.

**6. AMENDMENT**

Notwithstanding the above, this Policy will stand amended to the extent of any change in Applicable Laws. The Governing Board of the Manager reserves the right to amend or modify this Policy in whole or in part.