

Grievance Redressal Policy

of

Tamil Nadu Infrastructure Fund Management Corporation (TNIFMC)

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Introduction

At Tamil Nadu Infrastructure Fund Management Corporation Limited (hereafter will be referred as “TNIFMC”), we believe in serving various stakeholders involved with us for a sustained business growth and provide exemplary service. The purpose of this policy is to provide a clear and transparent mechanism for addressing grievances of employees of TNIFMC, investors, external stakeholders relating to the projects including complaints, concerns, queries, and issues registered by them.

Principles

The Grievance Redressal Policy is based on the following principles.

- All the investors, external stakeholders and employees are always treated fairly.
- Complaints or grievances by the investors, external stakeholders and employees are addressed in a timely manner and in good faith without prejudice.
- Investors, external stakeholders and employees are informed of the avenues to raise queries / complaints and their rights towards resolution of complaints.

Scope of the Policy

Any of the grievances / complaints received against any Director or Employees of the Company in the nature of unethical behavior, actual or suspected fraud or violation of Company’s code of conduct would be redressed under the Whistle Blower policy of the Company.

Definitions

“Company” includes the Tamil Nadu Infrastructure Fund Management Corporation Limited (TNIFMC), the existing funds managed by TNIFMC (Tamil Nadu Infrastructure Fund (TNIF), Tamil Nadu Shelter Fund (TNSF), Tamil Nadu Emerging Sectors Seed Fund (TNESSF)) and all the Funds to be managed in future.

“Investors” are persons who have invested in the share capital of TNIFMC or in the units of any of the funds managed or to be managed by TNIFMC.

“External Stakeholders” refers to all the investees, people involved / associated directly or indirectly with the projects.

“Employees” includes all those individuals who are directly appointed by the Company which includes those employed on deputation from Government, employed on contract basis or through service providers.

“Grievance” does not include queries or clarifications of any nature.

Procedure

This GR Policy covers three categories of stakeholders namely (i) Investors (ii) external stakeholders and (iii) employees. The procedure for handling each of the stakeholder grievances has been detailed below:



5.1 Investors

Investors can seek recourse for their grievance and are entitled to make a complaint in writing, orally or telephonically by following the below escalation procedure:

5.1.1– Through Investor Relations Officer

The investors can initiate any queries or grievances to the Investor Relations Officer at the first point. In the normal course, a response can be expected within **2 business days** of receipt of the communication.

Investor Relations Officer can be reached as below:

Name: Mr. Chidambareswaran S

Email: Investors can send an email to IRO@tnifmc.com.

Letter: Investors can write to TNIFMC with their complaint at the registered office address as mentioned below.

Tamil Nadu Infrastructure Fund Management Corporation Limited

No: 19, TP Scheme Road, Raja St. Extn.

RA Puram, Chennai 600 028

Board Phone Number: +91-44-24648400

Direct Phone Number: +91-44-24648410

5.1.2 - To the CEO

Investors can write to the CEO of TNIFMC, if they do not receive a response within 5 business days of writing to the Investor Relations Officer or if the investor is not satisfied with the response received. The investor can expect a reply within 7 business days of approaching the CEO.

CEO can be reached as below:

Name: Mr. Prashant Wadnere

Email: Investors can send an email to ceo@tnifmc.com.

Letter: Investors can write to the AMC with their query/complaint at the registered office address as mentioned below.

Tamil Nadu Infrastructure Fund Management Corporation Limited

No: 19, TP Scheme Road, Raja St. Extn.

RA Puram, Chennai 600 028

Board Phone Number: +91-44-24648400

Direct Phone Number: +91-44-24648401

5.1.3 - Through Registering via SCORES Portal

SCORES is a portal developed by SEBI for grievance redressal for investors.

Investors can register their grievance on SCORES portal via www.scores.gov.in, if no response is received within 30 days of approaching TNIFMC or if not satisfied with the resolution received.

Investors have the option to approach SEBI directly for any grievances / complaints through SCORES portal. Such grievances will be directed to TNIFMC for resolution. In case the complaints are not



redressed or no response is received from TNIFMC within 30 days, the same would be routed to SEBI for further resolution.

However, it is suggested to follow grievance redressal procedure through TNIFMC before opting for redressal through SEBI.

5.2 External Stakeholders

5.2.1 - Field Level Grievance Redressal Officer (GRO) and Company Level GRO

A Field Level GRO and the Company Level GRO will be appointed to address and manage all grievances / complaints received. Nomination of Field Level GRO will be made by the Investee Company in discussion with the Investment Principal at each site. The Company Level GRO will be appointed by the CEO.

Details of the Field Level GRO and Company Level GRO with the names, positions / designations, email, postal address and contact details along with escalation matrix will be displayed prominently in local language (Tamil) as well as in English at the main entrance of the project site, the Company's website and the websites of project owner / promoter / sponsor and the portfolio company appropriately.

5.2.2. Receipt and recording of grievances and complaints

All the external stakeholders who have any grievances / complaints can register the same by phone, post / courier, email, face-to-face or anonymously. A Grievance Register (GR) will be maintained for recording the grievances in the format prescribed (Annexure 7.1). The concerned GROs should record the grievance/ complaint in the GR, if communicated verbally by the aggrieved party. The complaints will be consolidated and maintained centrally by the Company Level GRO.

A unique serial number would be assigned to every grievance received and the same will be communicated to the aggrieved party & the Company Level GRO (where it is received at the project site). The record of such communication will be maintained by the concerned GROs and in the central log.

The Company Level GRO will work closely with the Field level GRO and the external stakeholders to conduct a review of grievances / complaints relying on the existing information available, relevant government departments and community around project site.

5.2.3 - Timeframe for resolution of grievances and complaints

The function/ department will revert to the concerned GRO with their response as soon as possible but not later than **7 days of receipt of complaint**, including any action deemed necessary, along with the approval by the appropriate authority for the same.

In case, the concerned GRO is not able to resolve the grievance, the grievance will be submitted to next levels as per the table below.



Levels of escalation will be as under

Levels of escalation	Action initiation	Decision	Reporting Authority
Level 1	7 days	7 days	Field Level GRO
Level 2	15 days	1 month	Company Level GRO
Level 3	30 days	2 Month – Final resolution	CEO
Level 4	2 Months	Final resolution	Further escalated to Board

In general, the entire process of grievance redressal should be maintained in the Grievance Reporting Form (Annexure 7.2.)

5.3 Employees

In case of any grievance faced by an employee, the employee may bring up the issue in two different ways:

- 1) Email / Letter
- 2) Open Door

5.3.1 – Email / Letter

An employee may choose to send an Email or letter to the Company Level GRO in case of any grievances / complaints. The GRO would keep the identity of the individual and their suggestions confidential.

Any anonymous complaints or any sort of concerns which are not related to office may not be pursued.

The GRO will consolidate complaints / grievances / suggestions and report to the CEO for further action within **5 business days**.

In case of grievance involving any Key Management Personnel, the same needs to be taken to the notice of the Board by the CEO or the GRO, in case of any complaint against the CEO.

5.3.2 - Open Door Method

The management firmly believes that no employee is prevented from coming to them directly with their grievance. Employees may meet the CEO directly to have their grievance properly attended to. The CEO may direct further action through the GRO.

However, the employees are encouraged to follow the below escalation process:

Levels of escalation	Action initiation	Decision	Reporting Authority
Level 1	1 week	15 days	Reporting officer/ Administration
Level 2	15 days	1 month	CEO / Company Level GRO
Level 3	1 month	2 months – Final resolution	Board



Approving Authority

Any revisions of this policy shall be effective post approval based on recommendations of the Board.



Annexure

Annexure 7.1. Grievance Register

The grievances received shall be recorded in a Grievance Register at project site. The following format shall be maintained:

Grievance Number	
Name of Complainant*	
Grievance Category	
Proposed Resolution Time	
Concerned Department	
Grievance Resolution Status	Closed/ Open/ Under Investigation
Remarks (if any)	

Annexure 7.2. Grievance Reporting Form (GRF)

Grievances Reporting for concerns, queries and issues registered by external stakeholders at the project site and those affected by the project:

Note: *-These rows need not be filled for Anonymous complaints.

Recording the Grievance	
Case No:	Date:
Name of the Person Raising Grievance/ Complainant*	
Address and Phone number of Complainant*:	
Gender	
Designation/Position*	
Location where the grievance occurred	
Grievance Category	<ul style="list-style-type: none"> • Environmental pollution • Social issues such as labour practices, working conditions etc. • Resettlement/displacement • Community health and safety • Violations of policies, guidelines and procedures • Misuse of funds/lack of transparency, or other financial management concerns at the Field or SPV/Company Level • Abuse, and discrimination • Bribery and corruption • Non-compliance to local laws • Others
Description of Grievance	
Supporting Documents (if any)	
Identity Confidentiality	Yes No



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Key personnel to be consulted/ interacted to resolve the grievance	
Signature of the person recording the grievance (in case of verbal grievance)	
Signature of the complainant*	

First Level - To be filled by Field Level GRO	
Outcome of interaction with key personnel	
Grievance Resolution	
Date of Grievance Resolution	
Resolution accepted by the complainant	Accepted Not accepted
Signature of complainant	
Signature of Field Level GRO	

Second Level - To be filled by Company Level GRO if the resolution of First Level is not accepted by the complainant	
Reason for non-acceptance	
Alternative mode of resolution suggested by the Company Level GRO	
Grievance Resolution	
Date of Grievance Resolution	
Resolution accepted by the complainant	
Signature of complainant*	
Signature of Company Level GRO	

To be filled by the CEO of TNIFMC if the resolution of Second Level is not accepted by the complainant	
Reason for non-acceptance	
Alternative mode of resolution suggested by the CEO	
Grievance Resolution	
Date of Grievance Resolution	
Resolution accepted by the complainant	
Signature of complainant*	
Signature of CEO	



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Annexure 7.3. Format of Investor Complaints Report

Complaint S.No	Complaint Made on (Date)	Complaint Made By Whom (Please write Anonymous if preferable)	Complainant Contact Number and Address	Complainant Email	Complaint/ Grievance	Action taken to resolve	Complaint resolved on and by	Complaint Pending