

Policy Title	Investor Grievance Redressal Policy
Entity	Bagmane Realty Investment Manager Private Limited (acting as Investment Manager to Bagmane Prime Office REIT)
Approval Date	28 <sup>th</sup> December, 2025
Approving Authority	Board of Directors of Bagmane Realty Investment Manager Private Limited (acting as Investment Manager to Bagmane Prime Office REIT)

INVESTOR GRIEVANCE REDRESSAL POLICY

1. Overview:

This Investor Grievance Redressal Policy (“IGR”) Policy is formulated to ensure efficient services to the Unitholders of the Bagmane Prime Office REIT (“Bagmane REIT”) and to effectively address their grievances, if any, in a timely manner.

In accordance with the terms of the Securities and Exchange Board of India (Real Estate Investment Trusts) Regulations, 2014, as amended (“REIT Regulations”), the Bagmane Realty Investment Manager Private Limited (“Manager”) of the Bagmane REIT is required to ensure adequate and timely redressal of all Unitholders’ grievances pertaining to activities of the Bagmane REIT.

2. Applicability:

This IGR Policy is applicable to the Bagmane REIT and shall be implemented through the Manager.

3. 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 or 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.

“Board” shall mean the board of directors of the Manager.

“Bagmane REIT” / “REIT” shall mean the Bagmane Prime Office Real Estate Investment Trust.

“IGR Policy”/“Policy” shall mean this policy on redressal of investor grievances, as amended from time to time.

“Manager” shall mean Bagmane Realty Investment Manager Private Limited.

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

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

**“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 the Bagmane REIT.

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

**“Unitholder”** shall mean any person who holds Units. The term ‘Investor’ shall refer to a Unitholder.

#### **4. Rights of Unitholders:**

Bagmane REIT shall, for the benefit of its Unitholders, create a two-way channel of communication wherein while Bagmane 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 Bagmane REIT with their information requirement or grievances, if any. Bagmane REIT shall implement a system wherein all kinds of communication received from the Unitholders are responded to in a timely and adequate manner.

#### **5. Redressal of Grievances:**

- a) The Manager shall require the registrar and transfer agent of the Bagmane REIT to have a dedicated e-mail id wherein the Unitholders can send their communication seeking information / raising grievances.
- b) The Manager shall also have a dedicated e-mail id wherein the Unitholders can forward their communication seeking information / raising grievances. The Manager shall depute an executive to monitor the queries / complaints of the Unitholders.
- c) The Manager shall redress investor grievances promptly, but not later than twenty-one calendar days from the date of the receipt of the grievance and in such manner as prescribed by the Board.
- d) The Board may recognize a body corporate for handling and monitoring the process of grievance redressal within such time and such manner as may be specified
- e) The Manager shall ensure to register the Bagmane REIT on the SEBI complaints redressal system (SCORES) platform or such other electronic platform or system as may be introduced by SEBI from time to time to enable the Unitholders to raise their grievances / complaints electronically in the manner specified by SEBI.
- f) The Manager shall constitute a Stakeholders’ Relationship Committee of Bagmane REIT to review the Unitholders complaints and to ensure timely redressal.
- g) The Board shall conduct themselves in an absolutely fair and transparent manner, adopt high ethical standards and act in the best interest of the Unitholders.

- h) The Manager shall file with the recognized Stock Exchange(s) on a quarterly basis, within 21 days from the end of each quarter, a statement furnishing details of the number of complaints received from Unitholders pending at the beginning of the quarter, received during the quarter, disposed of during the quarter and the number of complaints pending at the end of the quarter. The Manager shall also ensure to place the said information, on a quarterly basis, at meetings of its Board and share the said information with the Trustee.
- i) The Manager shall maintain a functional website of the Bagmane REIT wherein the contents of the said website should be kept periodically updated (up to the last two days) 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 Unitholders' grievances.
- j) The Manager shall maintain records pertaining to Unitholders grievances and actions taken thereon including copies of correspondences made with SEBI, if any, for a period of not less than seven years.
- k) The Manager shall devise an effective whistle blower mechanism enabling Unitholders, including individual employees and their representative bodies, to freely communicate their concerns about illegal or unethical practices.
- l) The Trustee shall periodically review the status of Unitholders' complaints and their redressal undertaken by the Manager.

## **6. Conflict with Law**

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.

## **7. Amendment of the Policy**

Notwithstanding the above, this Policy shall stand amended to the extent of any change in Applicable Laws without any action from the Manager or approval of the Unitholders. The Board reserves the right to amend or modify this Policy, in whole or in part, from time to time.