



## **INVESTORS GRIEVANCE REDRESSAL POLICY**

### **TITLE**

This Policy shall be called ‘Granules India Limited- Investors Grievance Redressal Policy’.

### **PREAMBLE AND OBJECTIVE**

- a. This Policy is formulated to provide efficient services to the shareholders and to effectively address and redress the grievances of the shareholders in a timely manner.
- b. This Policy was approved by the Board in its meeting held on 13<sup>th</sup> December 2021.
- c. The Company’s equity shares are listed on BSE Limited and National Stock Exchange of India Limited.
- d. Pursuant to various statutes and by virtue of their shareholding in the Company, shareholders enjoy several rights, which inter-alia include the right to receive all the benefits/ material information declared by the Company and actively participate in the AGM / EGM of the Company & E-voting events to vote on various resolutions proposed by the Company.
- e. The Company has appointed M/s. KFin Technologies Private Limited as its Registrar and Share Transfer Agent (“RTA”) to ensure faster and efficient provision of services to the shareholders. The RTA is primarily responsible for handling shareholders related affairs of the Company which are specified in this policy.
- f. The Company Secretary has been appointed to act as Compliance Officer of the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. As Compliance Officer, the Company Secretary is responsible for ensuring the provision of prompt and effective services to shareholders and monitoring the dedicated email address of the Company for shareholders’ grievances.

## DEFINITION

For the purpose of this Policy, the following words will carry the meaning as under:

- a. “**Board**” means the Board of Directors of Granules India Limited.
- b. “**Company**” means Granules India Limited.
- c. “**Stipulated turnaround time**” means the timelines as specified in the Policy for addressing the service request of the shareholders.

The words and phrases not defined under this Policy will carry the same meaning as defined under the Articles of Association of the Company; the Securities and Exchange Board of India Act, 1992 read with the rules and regulations made thereunder, including the SEBI (Listing Obligation and Disclosure Regulations), 2015; and the Companies Act, 2013 read with the rules made thereunder.

## LIST OF SERVICES TO BE EXTENDED BY RTA TO THE SHAREHOLDERS

The Shareholders can send their query /request /Complaint if any to the RTA on the following matters:

- Changes in /up-dation of the KYC details of the shareholders for physical holdings like the change of address/bank account details/ e-mail address /telephone/mobile/ nomination and PAN).
- Updating shareholder’s holding/title change requests viz name deletion, transmission, transposition, issue of duplicate shares in case of physical holdings.
- Dematerialization and rematerialization of securities through Depository Participants.
- For providing declaration with respect to recording of declaration w.r.t. exemption / lower tax rates for TDS on dividend and revalidation of dividend instruments.
- Providing details of allotment and clarification on the allotment.
- Information in case of an event of Dividend Payment, Stock Splits, Rights/ Bonus issue, Buyback, Merger/ De-merger activities etc.
- Addressing IEPF related queries/Claims with respect to shares transferred to IEPF Authority and to the unclaimed suspense account.

## **TIMELINES PERTAINING TO VARIOUS SERVICES EXTENDED BY RTA**

- a. RTA will address upon service request of the shareholders within the stipulated time mentioned in the below table.

<b>Sr No</b>	<b>Nature of Service</b>	<b>Expected Timelines (number of days)</b>
<b>Shareholders Service Request</b> (point no. 1-6 are only in case of physical holdings)		
1	Processing of transmission request	21
2	Processing of issue of the duplicate security certificate request	30
3	Processing of dematerialization request	15
4	Processing of rematerialisation request	30
5	Processing of transposition request	15
6	I. Processing of request for change in / up-dation of	
	a. Name	30
	b. Signature	30
	c. Nomination	30
	d. Contact details (Address, E-mail address and Mobile number)	15
	e. Bank account details	15
	II. Processing of request for updating of PAN	15
7	Processing of Re-validation of dividend and sending the remittance request files to the bank / Company	15

- b. Service requests other than those referred to in the above table shall be addressed by the RTA within a period of 7 to 15 days from the receipt of the request. In case any supporting documents are required by the RTA from the shareholders or any other party for addressing the request, such matters will be addressed within a period of 15 days from the receipt of such documents to the RTA's satisfaction.

In case of statutory timelines for redressal of any grievance, not specifically mentioned here, have been prescribed, the Company / RTA shall address such grievance within the timeline as prescribed under law.

## **CLASSIFICATION OF SHAREHOLDER COMMUNICATION**

The Company receives various correspondence/communication from the shareholders relating to the shares, annual reports, dividends, and ancillary matters. These communications may either be complaints or mere queries/requests by the shareholders. The Company presently follows a set of guidelines for classifying the shareholder's communication between general correspondence/requests/complaints, etc. These guidelines are internal to the Company.

The Company strives to follow the highest standards of corporate governance, transparency, and disclosures at all times. With a view to ensuring greater transparency and as a part of the Company's shareholders-friendly initiatives, the Share Transfer and Stakeholders Relationship Committee has considered it appropriate and desirable to formally document the present guidelines w.r.t the classification of shareholder's communication through this Policy.

In addition to the above, the Policy further lays down the process for redressal of complaints and the escalation matrix thereof.

## **GRIEVANCE REDRESSAL-MODES AND ESCALATION MECHANISM**

- a. Shareholders can lodge a complaint about non-receipt of any right available to them or failure of the RTA / Company to comply with any statutory obligation by giving the following details:
  - Nature of Complaint
  - Name of Issuer Company
  - DP ID & Client ID/Folio number.
  - Full Name of shareholder
  - The E-mail address and mobile number
  - Reference to any previous correspondence made in this regard
  - Provide the relevant documents and
  - Also, update KYC and details if there are any changes in the case of physical shareholders.
- b. Any information, other than those specified above, or any supporting documentation required for redressal of the complaint shall be informed to the Shareholders by the RTA. Shareholders are requested to furnish all the requisite information along with duly executed documents at the earliest to avoid any delay in the redressal of their complaints.
- c. In case of a non-satisfactory response from RTA, shareholders can also lodge their complaints through the Company's designated email address for investor grievances - [investorrelations@granulesindia.com](mailto:investorrelations@granulesindia.com). The designated email id is also displayed on the Company's website. Alternatively, shareholders can send their complaints to the registered office of the Company.

- d. If the shareholder does not receive a reply from the RTA within the stipulated turnaround time, he/she may approach the Company at the credentials mentioned above. Additionally, shareholders are urged to refrain from sending multiple reminders during the above-mentioned turnaround periods for redressal of their complaints.
- e. Shareholders are requested to approach the RTA, or in case of any inaction by the RTA, the Company, for redressal of their concerns prior to raising their concerns with the regulatory authorities.
- f. Only complaints sent on the addresses/email ids mentioned in this Policy will be treated as valid complaints.
- g. The Company periodically obtain a status report of the complaints from the RTA.
- h. The Share Transfer and Stakeholders Relationship Committee is responsible for the examination and redressal of the complaints by the shareholders.
- i. As required under Regulation 13 of the SEBI (LODR) Regulations, 2015 the Company files with the Stock Exchanges and places the statement of shareholders' complaints at the Board meeting on a quarterly basis. Further, the Company also makes annual disclosure of the statement of shareholders' complaints in its annual report pursuant to the Listing Regulations.

#### **GENERAL PRINCIPLES GUIDING CLASSIFICATION OF SHAREHOLDER'S COMMUNICATION:**

- a. Multiple correspondence/communications or reminders received for the same matter within the stipulated turnaround time in this Policy for the handling of the query/communication will be treated as one complaint.
- b. If a query is resolved after stipulated turnaround time and there is no reminder from the shareholder during such time period, such query will not be treated as a complaint.
- c. In case of any ambiguity, the Company Secretary shall be the sole authority to decide on the nature and classification of the communication and the decision of the Company Secretary shall be final and binding.

*Classification of shareholders' communication*

Sr. No.	Communication is not treated as Complaint	Communication treated as complaint
a.	<b>Non-receipt of annual report</b>	
	<p>First request or any such communication w.r.t. non - receipt of annual report will be considered as a request if, the Company has dispatched the annual report to the shareholder on or before the due date(s) through permissible means.</p> <p>Such communication shall be treated as a request for an additional copy of the annual report. The company shall respond to the request by intimating the original date of dispatch of the annual report and will also share a copy of the annual report in compliance with the shareholder's request.</p>	<p>Subsequent request(s) for non-receipt of the annual report to be treated and recorded as a complaint if,</p> <p>⇒ the Company / RTA has not dispatched the annual report to the shareholder on or before the due date(s), or</p> <p>⇒ the Company / RTA has not responded to shareholders' requests within the stipulated turnaround time.</p>
b.	<b>Non-receipt of dividend</b>	
	<p>First request or any such communication w.r.t. non-receipt of dividend will be considered as a query/request if, the Company has credited the dividend to the bank account of the shareholder or dispatched dividend Warrants/demand drafts on or before</p>	<p>Any communication w.r.t. non-receipt of dividend warrants/demand drafts sent to the Company or to the RTA after the expiry of the stipulated turnaround time for issuance of duplicate dividend warrant will be considered as a complaint.</p>

Sr. No.	Communication not treated as Complaint	Communication treated as complaint
	<p>the due date(s).</p> <p>When the Company is unable to pay out the dividend:</p> <p>⇒ In a case where the dividend is to be credited to the bank account of the shareholder, and such credit has been declined by the bank, the Company will pay out the dividend through a dividend warrant/demand draft in favour of the shareholder.</p> <p>⇒ In case the dispatched dividend warrant/demand draft is returned undelivered, the Company will proceed with re-dispatching the dividend warrant/demand draft only upon a written request by the shareholder. Such communication from the shareholder will be treated as a request and not a complaint.</p>	
c.	<b>Non-receipt of share certificates</b>	
	<p>Non-receipt of duly authenticated share certificate(s) upon sub-division / transfer/transmission/consolidation / re-materialization will be considered as a query if, the Company has dispatched the share certificates within prescribed time limits. The Company shall respond to the query by sharing details of dispatch to the shareholders. It is clarified that upon the dispatch of the share certificate through registered post or courier or any other approved mode, the Company shall be deemed to have discharged its duty and the shareholders are expected to coordinate with the postal/courier agency for the share certificates dispatched.</p>	<p>Communication w.r.t. non-receipt of duly authenticated share certificate(s) after the expiry of the statutory period for giving effect to the respective request will be treated as a complaint if, the Company has not dispatched the share certificates to the shareholder.</p>

Sr. No.	Communication not treated as complaint	Communication treated as complaint
d.	<b>Shareholder communication through statutory authorities</b>	
	<p>Any communication from shareholders through statutory authorities which:</p> <ul style="list-style-type: none"> <li>⇒ is not treated as a complaint by the statutory authority, and</li> <li>⇒ would not have been treated as a complaint by the Company if it was directly addressed to the Company, will not be treated as a complaint.</li> </ul> <p>As per the SEBI circular dated March 26, 2018, any grievances submitted to SEBI through SCORES will not be treated as complaints if the grievance is redressed by the Company within 30 days. Accordingly, such grievances registered with the SEBI will be not treated as complaints by the Company.</p>	<p>At times, requests/grievances are directly communicated to the statutory authorities by the shareholders. Such communications may not always qualify as a complaint under the guidelines adopted by the Company.</p> <p>However, since the statutory authorities treat all communication received from shareholders as a complaint, regardless of the nature of such communication, the Company is constrained to follow the classification as followed by the statutory authorities.</p> <p>Accordingly, any communication from shareholders received through statutory authorities viz. stock exchanges, Registrar of Companies, Regional Directors, SEBI, etc. which is treated as a complaint by such statutory authority, will be treated as a complaint by the Company.</p>
e.	<b>Others</b>	
	<ul style="list-style-type: none"> <li>i. Correspondence w.r.t. change in address, nominees etc will be considered as a request and not as a complaint if, the request is addressed within the stipulated turnaround time.</li> <li>ii. Any communication/suggestions/enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.</li> </ul>	<p>Any communication from the shareholders not responded to by the Company or not responded to by the Company within the stipulated turnaround time will be considered as a complaint.</p>



Sr. No.	Communication not treated as complaint	Communication treated as complaint
	<p>iii. Any communication requisitioning information or documents relating to the Company or its operations as per statutory rights available to the shareholders will be treated as a request if, the requisition is in proper format and the Company has responded to the same within prescribed time limits.</p> <p>iv. Incomplete communications, communications without requisite supporting documentation or any communication which is vague or non-specific in nature will not be treated as a complaint.</p> <p>v. Communications/complaints in relation to matters that are sub-judice will not be treated as a complaint under this Policy.</p>	

## CONTACT DETAILS

Particulars	Contact details
<b>REGISTRAR AND SHARE TRANSFER AGENT (RTA)</b>	<p>M/S. KFin Technologies Private Limited Selenium Tower B, Plot 31-32, Gachibowli, Financial District, Nanakramguda, Hyderabad – 500 032. <b>Toll-Free No.:</b> 1- 800-309-4001 <b>Shareholders Grievance</b> <b>ID:</b> <a href="mailto:einward.ris@kfintech.com">einward.ris@kfintech.com</a> <b>Website:</b> <a href="http://www.kfintech.com">www.kfintech.com</a></p>
<b>COMPANY</b>	<p>Ms. Chaitanya Tummala Company Secretary, Compliance Officer and Nodal Officer Granules India Limited 2nd Floor, 3rd Block, My Home Hub Madhapur, Hyderabad (TS) – 500081 <b>Tel:</b> +91 40 69043500, <b>Fax:</b> +91 40 23115145, <b>ID:</b> <a href="mailto:investorelations@granulesindia.com">investorelations@granulesindia.com</a> <b>Website:</b> <a href="http://www.granulesindia.com">www.granulesindia.com</a></p>