



# GHCL INVESTOR GRIEVANCE REDRESSAL POLICY



**GHCL Limited**

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# GHCL Investor Grievance Redressal Policy

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Revision No. 01

Publish Date: 25-Mar-22

A handwritten signature in blue ink, appearing to be 'S. K. Sharma'.





## TITLE

This Policy shall be called 'GHCL Investor Grievance Redressal Policy'

## PREAMBLE AND OBJECTIVE

- a. The Stakeholders Relationship Committee of the Board has approved the policy in their meeting held on March 25, 2022
- b. GHCL's equity shares are listed on BSE Limited and National Stock Exchange of India Limited.
- c. This Policy is formulated with an intent to provide efficient services to our investors and to effectively address and redress their grievances in a timely manner.
- d. The Company has appointed M/s. Link Intime India Private Limited as its Registrar and Transfer Agents ("RTA") to ensure faster and efficient provision of services to the investors. The RTA is primarily responsible for handling shareholders related affairs of the Company.
- e. Pursuant to provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the applicable provisions of the Companies Act, 2013 and various other statutes shareholders enjoy several rights subject to their shareholding, which inter-alia include the right to receive
  - i. share certificates pursuant to transfer, transmission, split etc.,
  - ii. any dividend on the shares declared by the Company,
  - iii. annual reports and AGM notice, and
  - iv. such other rights available under law for the time being in force.
- f. The Board has appointed the Company Secretary to act as Compliance Officer of the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"). As Compliance Officer, the Company Secretary is responsible for ensuring provision of prompt and effective services to shareholders and monitoring the dedicated email address of the Company for investor grievances (i.e. [secretarial@ghcl.co.in](mailto:secretarial@ghcl.co.in)).

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 Listing Regulations; and the Companies Act, 2013 read with the rules made thereunder.





## INVESTOR SERVICE TIMELINES

The Company and its RTA follow the following timelines for performance of its duties toward shareholders:

- a. Matters such as change of address, non-receipt of annual report and updation of bank details. These matters are addressed by the RTA within a period of **30 working days** from the receipt of the request or in case, any supporting documents are required by the RTA for addressing the request, **within a period of 15 working days** from the receipt of such documents to the RTA's satisfaction.
- b. Matters other than those referred in point (a) above, including but not limited to transfers, change of name, dematerialisation, and loss of share certificates, are addressed by the RTA **within a period of 15 to 30 days from the receipt** of the request. In case, any supporting documents are required by the RTA from the shareholder or any other party for addressing the request, such matters will be addressed **within a period of 15 to 30 days from the receipt** of such documents to the RTA's satisfaction.

In case 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

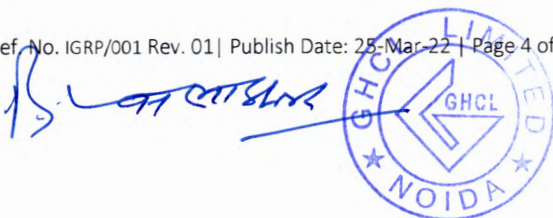
The Company receives various correspondence / communication from the investors relating to the shares, annual reports, dividends and ancillary matters. These communications may either be complaints or mere queries / requests by the shareholders. The Company presently follows a set of guidelines for classifying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

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

In addition to the above, the Policy broadly defines its investor servicing timelines and further lays down the process for redressal of complaints and the escalation matrix thereof.

### General Principle guiding classification of shareholders' communication

- a. Multiple correspondence / communications or reminders received for the same matter within the stipulated turnaround time in this Policy for handling of the query / communication will be treated as one complaint.
- b. If a query is resolved after the stipulated turnaround time and there is no reminder from the shareholder during such time period, such query will not be treated as 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.
- d. **Classification of shareholders' communication**





Sl. No.	Communication not treated as a complaint	Communication treated as a complaint
1.	<b>Non-receipt of annual report:</b> 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.  Such communication shall be treated as request for an additional copy of the annual report. Company shall respond to the request by intimating the original date of dispatch of annual report and will also share a copy of the annual report in compliance with the shareholder's request.	Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if, (a) the Company / RTA has not dispatched the annual report to the shareholder on or before the due date(s), or  (b) the Company / RTA has not responded to shareholder's request within the stipulated turnaround time.
2.	<b>Non-receipt of dividend</b> 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 the due date(s).  When the Company is unable to pay out the dividend: (a) In 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. (b) 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.	
3.	<b>Non-receipt of share certificates</b> 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 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	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.





	the poRTAI / courier agency for the share certificates dispatched.	
<b>4.</b>	<b>Shareholder communication through Statutory authorities</b>	
	<p>Any communication from investors through Statutory authorities which:</p> <ul style="list-style-type: none"> <li>(a) is not treated as a complaint by the Statutory authority will not be treated as a complaint by the company, and</li> <li>(b) which 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 by the company.</li> </ul> <p>As per 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 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 investors. 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 investors as 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 investors received through Statutory authorities viz. stock exchanges, Registrar of Companies, Regional Directors, SEBI, etc. which is treated as complaint by such Statutory authority, will be treated as a complaint by the Company.</p>
<b>5.</b>	<b>Others</b>	
	<ul style="list-style-type: none"> <li>a. 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>b. Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.</li> <li>c. 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 request if, the requisition is in proper format and the Company has responded to the same within prescribed time limits.</li> <li>d. Incomplete communications, communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint.</li> <li>e. Communications / complaints in relation to matters that are sub-judice will not be treated as a complaint under this Policy.</li> </ul>	<p>Any communication from the investor not responded to by the Company or not responded by the Company within the stipulated turnaround time will be considered as complaint.</p>

## INVESTOR GRIEVANCE REDRESSAL MECHANISM

- a. Investors can lodge a complaint for non-receipt of any right available to them or failure of the RTA / Company to comply with any Statutory obligation by giving details of their name, folio no., DP ID / Client ID, nature and full particulars of their complaint directly to the RTA, except for matters relating to shares /





dividend transferred to Investor Education and Protection Fund (IEPF). For IEPF related matters, investors can directly contact the Dy. Nodal Officer and/or Nodal Officer of the Company as specified under the Contact Details section of this Policy.

- b. Any information, other than those specified above or any supporting documentation required for redressal of the complaint shall be informed to the investors by the RTA. Investors are requested to furnish all the requisite information along with duly executed documents at the earliest to avoid any delay in redressal of their complaints.
- c. The Company has a designated email ID [secretarial@ghcl.co.in](mailto:secretarial@ghcl.co.in) for handling investor grievances on which investor can send a complaint. This e-mail ID is mentioned on every communication of the Company to the shareholders and is also mentioned on the website of the Company. Alternatively, investors can send their complaints at the registered office of the Company and / or to the corporate office of the company, depending upon their convenience.
- d. Executives in the Corporate Secretarial Department access the above-mentioned designated investor grievances e-mail ID on a regular basis to check whether any new complaint or request from security holders has been received.
- e. Full details of the complaint or request are immediately thereafter informed to Link Intime India Private Limited.
- f. Corporate Secretarial Department obtains all information available on the complaint or request which is considered necessary for a proper resolution of the grievance. It looks into all the necessary information and undertakes to resolve them as soon as possible.
- g. If the investor 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, investors are urged to refrain from sending multiple reminders during the above-mentioned turnaround periods for redressal of their complaints.
- h. Investors 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.
- i. Only complaints sent on the addresses / email ids mentioned in this Policy will be treated as valid complaints.
- j. The Company periodically obtains status report of the complaints from the RTA.
- k. The Stakeholders Relationship Committee is responsible for the examination and redressal of the complaints by investors.
- l. As required under Regulation 13 of Listing Regulations, the Company files with the Stock Exchanges and places the statement of investor complaints at the Board meeting on a quarterly basis. Further, the Company also makes annual disclosure of the statement of investor complaints in its annual report pursuant to the Listing Regulations.





## CONTACT DETAILS

	Contact details	Address
For share related matters	Link Intime India Private Limited Email id : <a href="mailto:ganapati.haligouda@linkintime.co.in">ganapati.haligouda@linkintime.co.in</a>	C-101, 247 Park LBS Marg, Vikhroli (West) Mumbai- 400083
For IEPF related matters	Mr. Bhuneshwar Mishra Nodal Officer <a href="mailto:bmishra@ghcl.co.in">bmishra@ghcl.co.in</a>	GHCL Limited, GHCL House, B-38, Institutional Area, Sector-1, Noida – 2021301 Email Id: <a href="mailto:secretarial@ghcl.co.in">secretarial@ghcl.co.in</a>
	Mr. Manoj Kumar Ishwar Dy. Nodal Officer <a href="mailto:manoji@ghcl.co.in">manoji@ghcl.co.in</a>	
	Mr. Prabhakaran J Mudaliar Dy. Nodal Officer <a href="mailto:prabhakaran@ghcl.co.in">prabhakaran@ghcl.co.in</a>	

## CHANGE LOG

1.	Type of Document	Policy
2.	Document created on	March 25, 2022
4.	Approved by Stakeholder's Relationship Committee	March 25, 2022
6.	Document Control	Corporate Secretarial

Certify by

**Bhuneshwar Mishra**  
Sr. GM-Sustainability & Company Secretary

