

INVESTOR RELATION POLICY

1. Background:

This Policy is formulated to provide efficient services to the investors and to effectively address and redress the grievances of the investors in a timely manner. The Company's equity shares are listed on BSE Limited and National Stock Exchange of India Limited

2. Objective of Policy:

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 (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. Hence, there is always a possibility that there may be some grievance raised by the Investor. This policy is prepared to deal with such matter and provide satisfactory redressal to the Investor.

The Company has appointed M/s. Link In Time India Private Limited as its Share Transfer Agents ("STA") to ensure faster and efficient provision of services to the investors. The STA is primarily responsible for handling shareholders related affairs of the Company.

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.

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.

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

3. General Principle guiding classification of shareholders' communication:

- 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.
- 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.
- Communications are as follows:

Clarification of Shareholders's communication:

Sr. No.	Communication not treated as complaint	Communication treated as complaint
a.	Non-receipt of annual report	
	<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 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.</p>	<p>Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if,</p> <ul style="list-style-type: none"> • the Company / STA has not dispatched the annual report to the shareholder on or before the due date(s), or • the Company / STA has not responded to shareholder's request within the stipulated turnaround time.

b.	Non-receipt of dividend	
	<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 the due date (s).</p> <p>When the Company is unable to pay out the dividend:</p> <ul style="list-style-type: none"> • 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. • 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>Any communication w.r.t. non-receipt of dividend warrants / demand drafts sent to the Company or to the STA after the expiry of the stipulated turnaround time for issuance of duplicate dividend warrant will be considered as complaint.</p>
c.	Shareholder communication through statutory authorities	
	<p>Any communication from investors through statutory authorities which:</p> <ul style="list-style-type: none"> • is not treated as a complaint by the statutory 	<p>At times, requests / grievances are directly communicated to the statutory authorities by the investors. Such communications may not always qualify as a</p>

	<p>authority, and</p> <ul style="list-style-type: none"> • 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. <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>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>
d.	Others	
	<p>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.</p> <p>Any communication/suggestions /enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.</p> <p>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</p>	<p>Any communication from the investor having supportive and proper documents and information not responded to by the Company or not responded by the Company within the stipulated turnaround time will be considered as complaint.</p>

	<p>prescribed time limits.</p> <p>Incomplete communications, communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint.</p> <p>Communications / complaints in relation to matters that are subjudice will not be treated as a complaint under this Policy.</p>	
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4. Investor Grievance Redressal Mechanism:

- a. Investors can lodge a complaint for non-receipt of any right available to them or failure of the STA / 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 to the Company, except for matters relating to shares / dividend transferred to Investor Education and Protection Fund (IEPF).
- 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 Company. 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. Investors can also lodge their complaints through the Company's designated email id - cs@suvidhaa.com. The designated email id is also displayed on the Company's website. Alternatively, investors can send their complaints at the registered office of the Company.
- d. Only complaints sent on the addresses / email ids mentioned in this Policy will be treated as valid complaints.
- e. The Company periodically obtains status report of the complaints from the STA.
- f. The Stakeholders Relationship Committee is responsible for the examination and redressal of the complaints by investors.

- g. 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.

5. Policy Review:

This Policy shall be subject to review as may be deemed necessary and in accordance with any regulatory amendments.