

# INVESTOR GRIEVANCE REDRESSAL POLICY

## A. TITLE

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

## B. PREAMBLE AND OBJECTIVE

- a. This Policy is formulated to provide efficient services to the investors and to effectively address and redress the grievances of the investors of Naturo Indiabull Limited in a timely manner.
- b. The coverage of this policy is to redress the grievance of all the securities issued by Company, which are listed on the stock exchanges in India..
- c. This Policy was approved by the Stakeholders Relationship Committee of the Board of Company (Investment Manager of Company) in its meeting held on 14/08/2022.
- d. The Equity share of Company are listed on National Stock Exchange of India Limited BSE -SME.
- e. The Company has appointed M/S. Linkintime India Private Limited as its Registrar & Transfer Agents ("RTA") to ensure faster and efficient provision of services to the investors. The RTA is primarily responsible for handling the security holders related affairs of the Company.
- f. The Board has appointed the Company Secretary to act as Compliance Officer of the Company. As Compliance Officer, the Company Secretary is responsible for ensuring provision of prompt and effective services to the security holders and monitoring the dedicated email address of Company for investor grievances.

## C. DEFINITION

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

- a. "**Board**" means the Board of Directors of Naturo Indiabull Limited (Formerly Known as IT Indiabull Private Limited)
- b. "**Company**" means Naturo Indiabull Limited (Formerly Known as IT Indiabull Private Limited)
- c. "**Policy**" means this Policy on Investors' Grievance Redressal Mechanism.
- d. "**SCORES**" is a web based centralized grievance redressal system of SEBI (<http://scores.gov.in>), which enables the investors to lodge and track anywhere the status of redressal of such complaints online from the above website.
- e. "**Stipulated Turnaround Time**" means the timelines as specified in the "Investor Service Timelines" section of this Policy or prescribed statutory timelines (if any), whichever is earlier.

## D. INVESTOR SERVICE TIMELINES

Company and its RTA follow the following timelines for performance of its duties toward security holders:

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

1. 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 5 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 5 working days from the receipt of such documents to the RTA's satisfaction.
2. Matters other than those referred in point (a) above, including but not limited to transfers, change of name, dematerialization, and loss of share certificates, are 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 shareholder 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 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.

## **E. CLASSIFICATION OF SECURITYHOLDER COMMUNICATION**

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

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 security holders' communication through this Policy.

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

### ***General Principle guiding classification of security holders' 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 security holder 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. For clarity, examples of request v/s complaint / grievance are presented below:

***Classification of security holders' communication***

Sr. No.	<i>Communication not treated as complaint</i>	<i>Communication treated as complaint</i>
<b>a.</b>	<b><i>Non-receipt of annual report</i></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 security holder 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 security holder's request.</p>	<p>Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if,</p> <p>⇒ the Company / RTA has not dispatched the annual report to the security holder on or before the due date(s), or</p> <p>⇒ the Company / RTA has not responded to security holder's request within the stipulated turnaround time.</p>
<b>b.</b>	<b><i>Non-receipt of dividend</i></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 the due date(s).</p> <p>When the Company is unable to pay out the dividend:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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</li> </ul>	<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 demand draft will be considered as complaint.</p>

<b>c.</b>	<p><b><i>Non-receipt of share certificates</i></b></p> <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.</p> <p>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 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>
<b>d.</b>	<p><b><i>Securityholder communication through statutory authorities</i></b></p> <p>Any communication from investors 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>⇒ 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.</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, SEBI, etc. which is treated as complaint by such statutory authority, will be treated as a complaint by the Company.</p>
<b>e.</b>	<p><b><i>Others</i></b></p> <p>i. Correspondence w.r.t. complete breakup details of Distribution/Interest, Re-processing of Distribution/Interest for cases like stale DD, transmission etc. will be considered as a request and not as a complaint if, the request is addressed within the stipulated turnaround time.</p> <p>ii. 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 from the investor not responded to by Company or RTA or not responded by Company or RTA within the stipulated turnaround time will be considered as complaint.</p>

	<p>iii. Any communication requisitioning information or documents relating to the Company or its operations as per statutory rights available to the security holders will be treated as 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 nonspecific 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>	

## **F. 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.
- 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. In case of non-satisfactory response from RTA, investors can also lodge their complaints through the Company's designated email id for investor grievances – cs@debockgroup.com. The designated email ids are also displayed on the Company's website. Alternatively, investors can send their complaints at the principal place of business of the Company.
- d. 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.
- e. Investors are requested to approach the Company, for redressal of their concerns before 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 obtains status report of the complaints from the RTA.
- h. The Stakeholders Relationship Committee is responsible for the examination and redressal of the complaints by investors.
- i. As required under SEBI Circular No. CIR/IMD/DF/127/2016 dated November 29, 2016, the Company files with the Stock Exchanges and places the statement of investor complaints at the Stakeholders Relationship Committee and Board meeting on a quarterly basis. Further, Company also submits statement of investor complaints to Trustee of Company on a quarterly basis. Further, the Company also makes annual disclosure of investor complaints in its annual report pursuant to the InvIT Regulations.

## **CONTACT DETAILS OF THE RTA**

### **LINKINTIME INDIA PRIVATE LIMITED**

C 101, 247 Park, L.B.S.Marg, Vikhroli (West),  
Mumbai – 400083

**Tel:** 022 4918 6000

**Email Address:** [mumbai@linkintime.co.in](mailto:mumbai@linkintime.co.in)

### **G. MISCELLANEOUS**

- a. The Chief Executive Officer, Chief Financial Officer or Company Secretary are severally authorized to amend this Policy for giving effect to any changes / amendments notified by the SEBI.
- b. This Policy shall be effective from 02<sup>nd</sup> September, 2022 and can be modified, withdrawn or suspended by Company at its sole discretion without any prior intimation.

**For Naturo Indiabull Limited**

**SD/-**

**Gaurav Jain**

**Director**

**DIN: 08560737**