

# POLICY FOR REDRESSAL OF INVESTOR GRIEVANCES



## 1. PREAMBLE:

#### 1.1. APPLICABILITY:

The Company's equity shares are listed on BSE Limited and National Stock Exchange of India Limited. Further, pursuant to various statues and by virtue of their shareholding, Shareholders enjoy several rights, which inter-alia include the right to receive (i) share certificates pursuant to transmission, split, replacement 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.

With a view to ensure that our Shareholders receive exemplary service across different touch points, this Policy has been formulated to effectively address and redress the grievances of the investors in a timely manner.

#### 1.2. VISION & OBJECTIVES:

The Company strives to follow highest standards of Corporate Governance, transparency and disclosure at all times. Investors/Shareholders servicing is one of the key ingredient of good Corporate Governance practices. Recognising this element, Investors/Shareholders servicing becomes an inevitable practice to enhance stakeholders' confidence. Accordingly, the Company has an established mechanism for Investors/Shareholders service and grievance handling with the following objectives:

- 1) Investors/Shareholders are treated fairly at all times.
- 2) Complaints raised by Investors/Shareholders are dealt with courtesy and in timely manner.
- 3) Investors/Shareholders are informed of avenues to raise their queries and complaints within the organization, and their rights, if they are not satisfied with the resolution of their complaints.
- 4) Communications, Queries and Complaints are treated differently, effectively and fairly.

## 2. CLASSIFICATION OF SHAREHOLDER COMMUNICATION:

The Company receives various correspondence/communication from the investors relating to 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.



# Guidelines for classification of Shareholders' communication into Complaints/Queries

S.	Particulars	Treatment as Request	Treatment as Complaint
No			
1.	Receipt of hard copy of Annual Report	<ul> <li>If the request is received before the due date of dispatch of Annual Report for the purpose of AGM.</li> </ul>	<ul> <li>If the first request from the shareholder has not been entertained within the stipulated turnaround time.</li> </ul>
		<ul> <li>If the request is received, for the first time, after the Annual Report has been already dispatched to shareholders on or before due date.</li> </ul>	<ul> <li>If the Annual Report has not been dispatched to shareholders on or before due date.</li> </ul>
2.	Payment of Dividend	<ul> <li>If the request is received before the due date of payment of Dividend.</li> </ul>	<ul> <li>If the dividend is not paid on or before the Due Date.</li> </ul>
		<ul> <li>If the request is received, for the first time, after the Dividend has been already disbursed to shareholders on due date.</li> </ul>	<ul> <li>If the communication for not having received the dividend is not considered within 30 days of receipt of the same.</li> <li>A reminder after 30 days for the earlier request will be considered as complaint</li> </ul>
3	Non-receipt of duplicate/ revalidated warrants/Demand Draft	<ul> <li>If the request is received, for the first time, after the duplicate/ revalidated warrant/demand draft has been already dispatched to shareholder.</li> </ul>	<ul> <li>If the communication for not having received the warrant/demand draft is not considered within 30 days of receipt of the same.</li> </ul>
		<ul> <li>The Co. shall share the details of dispatch to the shareholders.</li> </ul>	
4	Non-receipt of Share Certificates upon sub- division/ transmission/ Consolidation/re- materialization	If the request is processed within prescribed time limits from the date of receipt of specified documents.	If the request is not processed within prescribed time limits from the date of receipt of specified documents.
5	Processing of Demat/Remat Requests	If the request is processed within 30 days from the date of receipt of specified documents.	If the request is not processed within 30 days from the date of receipt of specified documents.
6	Incompleteness - incomplete/ inadequate service	Where an Investor has raised multiple queries and if any query was inadvertently missed to be responded.	Where the missed query is not responded within 7 days from the date of receipt of request.



7	Non-action of activity agreed in communication to Shareholders	Failure to Call back or non-dispatch of forms etc. within 10 days from last response.	Failure to Call back or non-dispatch of forms etc. beyond 10 days from last response.
8	Non updation of profile/address/bank mandate/contact details etc.	If reminder is received within 30 days of request received for updation of details under folio.	If reminder is received after 30 days of request received for updation of details under folio.
9	Shareholders communication through statutory authorities	Any communication from Shareholders through statutory which is not treated as a complaint by the statutory authority or 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.	Any communication from shareholders 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.
10	Communication/sug gestions/enquiry	Any communication/suggestion/ enquiry about procedures for any action will be considered as a request/general enquiry and not a complaint.	Any communication/suggestion/ enquiry not responded to by the Company within 15 days' time will be considered as complaint.
11	Others	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.	
		Incomplete communications, communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint.	
		Communications / complaints in relation to matters that are subjudice will not be treated as a complaint under this Policy.	



# 3. INVESTOR/SHAREHOLDER GRIEVANCE HANDLING MECHANISM:

- a) The Stakeholders Relationship Committee of the Board is entrusted with the responsibility to specifically look into the mechanism of redressal of grievances of shareholders, debentures holders and other security holders.
- b) The Company has appointed M/s Link Intime Services Pvt. Ltd. as its Registrar & 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.
- c) The Board has appointed the Company Secretary of the Company to act as the 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.
- d) The Company has a designated Email <a href="mailto:investors@naukri.com">investors@naukri.com</a> for handling investor grievances on a day to day basis on which investor can make a complaint. This email-id is mentioned on every public communication being made by the Company with the shareholders and also put on the website of the Company. This email-id is directly monitored by the Compliance Officer.
- e) The investor complaints are also processed through a centralised web-based complaints redress system called SEBI Complaints Redress System (SCORES). The complaints lodged through SCORES get directed to the Compliance Officer automatically.

## 4. PROCESS OF HANDLING STAKEHOLDER GRIEVANCES:

- a) The Stakeholders shall make a written complaint to the RTA or to the Compliance Officer.
- b) The Secretarial Team will obtain all relevant information on the complaint for proper investigation and undertakes to resolve them as soon as possible.
- c) The Company follows the practice of resolving the investor complaints within 7 days of receipt of complete documents.
- d) The investor complaints received through SCORES, proactive approach is taken to obtain necessary information and documents so as to resolve the same with statutory timelines with the help of RTA.
- e) Action Taken Report is filed on SCORES within 7 (seven) days from the date of receipt of complaint as against the statutory timeline of 30 (thirty) days.



f) The Compliance Officer of the Company reviews the investor complaints status on a regular basis to ascertain whether complaint received has been resolved within time or not.

## 5. STAKEHOLDER ENGAGEMENT:

The Company focuses to build Investor Relations on pillars of trust and transparency. The Secretarial Department of the Company effectively deploys tools like Annual Reports, Quarterly Earnings, Investor Releases, Conference calls, one on one Investor meets, General Meetings and Internet (Company website) to serve as a link to stay connected with the Investors. Further, quarterly emails are sent to all shareholders intimating financial results of the Company.

It is the constant endeavour of the Company to improve the standard of its Investor services. In pursuit of excellence in Corporate Governance and to constantly improve standards of service, communication and disclosures, the Company conducts a shareholders satisfaction survey on a continuous basis to assess the requirement and satisfaction of valuable Investors on broad parameters receipt such as timely of Annual Reports, Dividend documents/correspondence, Quality and contents of Annual Report, Response time and satisfaction level experienced in transfer/transmission of shares, sub-division of shares, issue of duplicate share certificates, change of address, revalidation of dividend warrants, exchange with new share certificates etc.

## 6. MONITORING & FEEDBACK:

- a) The Company Secretary will submit a quarterly report to the Stakeholder's Relationship Committee about the complaints received by the Company and resolution provided to the Stakeholders. Further, a status report on quarterly basis is obtained from the RTA of the Company in respect of various correspondences and complaints received by them against the Company and status of redressal of the same is placed before the Stakeholders Relationship Committee of the Company.
- b) The Stakeholders' Relationship Committee will further place the Report at the Board Meeting informing about the number of complaints received and the manner in which they were dealt by the Company.
- c) The Company follows the practice of obtaining monthly Status Report of investor complaints pending against the Company from Stock Exchanges as well as SEBI and same are placed in the ensuing Stakeholders Relationship Committee meeting and Board Meeting of the Company.
- d) Pursuant to Regulation 13(3) read with Regulation 13(4) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Statements of investor complaints as received from the RTA, are filed with BSE & NSE on a quarterly basis and the said Statements are also



placed before the Stakeholders Relationship Committee and Board of Directors for information and noting.

# 7. GENERAL:

- a) Any or all provisions of this policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued by the Government, from time to time.
- b) The Company reserves the right to modify, add, delete or amend any of the provisions of this Policy.
- c) In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference shall be made to SRC Committee. In all such matters, the interpretation and decision of the SRC Committee shall be final.