



UNIT-I



UNIT-II

**Bharat
RASAYAN LIMITED**

Regd. Off. : 1501, Vikram Tower, Rajendra Place, New Delhi - 110008
Ph. : +91-11-43661111 (30 lines) • Fax : +91-11-43661100, 41538600
E-mail : info@bharatgroup.co.in • Website : www.bharatgroup.co.in
CIN : L24119DL1989PLC036264

INVESTOR'S GRIEVANCE REDRESSAL POLICY

1. INTRODUCTION

Bharat Rasayan Limited ('the Company'), strives to provide efficient services to the investors and to effectively redress the grievances of the investors in a timely manner.

The Company's Equity Shares are listed on National Stock Exchange of India Limited ('NSE').

2. OBJECTIVE & SCOPE

The objective of the Policy is to promote and build a prompt Investor Grievance Redressal mechanism and investor friendly relations. The Policy thus recognizes the investors' right to always have a contact address available to enable them to query or record a grievance. This also enables the Company use investors' views as a feedback mechanism.

The coverage of this policy is to redress the grievance of all the securities issued by the Company, which are listed on the Stock Exchanges in India.

M/s. Link Intime India Pvt. Limited is the Registrar and Transfer Agents ('RTA') of the Company. The RTA is primarily responsible for handling the security holders related affairs viz., matters related to transfer of securities, transmission & other Shareholders Investors Grievance related activities. The Secretarial Department oversees the activities of the RTAs to ensure timely transmission, duplicate issue and demat of shares and prompt service in investor related matters.

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 the Company for investor grievances.

3. DEFINITIONS

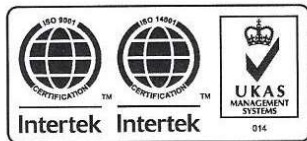
For the purpose of this Policy, the following words will carry the meaning as under:

- a) "Board" means the Board of Directors of Bharat Rasayan Limited.
- b) "Policy" means this Policy on Investors' Grievance Redressal Mechanism.
- c) "SCORES" is a web based centralized grievance redressal system of SEBI (<https://www.scores.gov.in>), which enables the investors to lodge and track from anywhere, the status of redressal of such complaints online from the above website.
- d) "Securities" means Securities as defined under the Securities Contract (Regulation) Act, 1956.
- e) "Stipulated Turnaround Time" means the timelines as specified in the "Investor Service Timelines" section of this Policy.

4. GRIEVANCE HANDLING MECHANISM

The Company has an established mechanism for investor service and grievance handling with RTA as detailed below –

- The Company has a designated email ID investors.br1@bharatgroup.co.in for handling investor grievances on which investor can send a complaint. This e-mail ID is mentioned



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on every communication of the Company to shareholders and is also mentioned on the website of the Company.

- Executives in the 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.
- Full details of the complaint or request are immediately thereafter informed to RTA.
- Upon receipt of the necessary documentation and information, and after satisfying the necessary quality checks, the RTA follows the practice of resolving the investor complaint or request promptly and as per the service standards.
- Investor Complaints Status Report is obtained on a quarterly basis from RTA in respect of various correspondences and complaints received by the Company directly or by RTA.
- The Company engages a practicing Company Secretary for carrying out Reconciliation of Share Capital Audit, in pursuance of statutory requirements.
- The status of receipt, redressal and pendency of all the complaints are placed before the Stakeholder's Relationship Committee and Board.
- RTA of the Company is primarily responsible to resolve the investor's grievances. RTA is responsible for discharging investor service functions effectively, efficiently and expeditiously.
- The complaints received through Stock Exchanges are attended within the time stipulated by the Stock Exchanges.
- All the investor complaints/grievance received online through "SEBI Complaints Redress System" (SCORES) are checked regularly and replied/resolved expeditiously.
- The Company, in its Annual Report, also reminds the Investors to claim unclaimed dividends.

The Company has also constituted the Stakeholders Relationship Committee (SRC) which functions under the Chairmanship of an Independent Director, to examine and redress complaints by shareholders and investors. The SRC meets as often as required to resolve shareholders' grievances including complaints related to transmission of shares, non-receipt of annual report, non-receipt of declared dividends, issue of new/duplicate certificates etc. The SRC also reviews measures taken by the Company for effective exercise of voting rights by Shareholders.

In addition to the above, SRC reviews adherence to the service standards adopted by the Company in respect of services being rendered by the RTA, review of various measures and initiatives taken by the Company for reducing the quantum of unclaimed dividends and ensuring timely receipt of dividend warrants/annual reports/statutory notices by the Shareholders of the Company. The SRC is authorised to approve request for transmission of shares and issue of duplicate share certificates.

5. CLASSIFICATION OF CORRESPONDENCE / COMMUNICATION

The Company receives various correspondence / communication from investors relating to shares, annual reports, dividend and ancillary matters. These communications may either be complaints or mere queries / requests by the securityholders. The Company presently follows



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a set of guidelines for classifying the security holders' communication between general correspondence, requests, complaints, etc.

The Company has also constituted the Stakeholder's Relationship Committee ('SRC') to examine and redress complaints by shareholders and investors.

The role of SRC is also to review broadly the correspondence dealt by the RTA. In addition to the above, SRC to also review adherence to the service standards adopted by the Company in respect of services being rendered by the RTA, review of various measures and initiatives taken by the Company for reducing the quantum of unclaimed dividends and ensuring timely receipt of dividend warrants/ annual reports/ statutory notices by the Shareholders of the Company.

6. POLICY ADHERENCE RESPONSIBILITY:

The Company Secretary and Compliance Officer to ensure that all mandatory provisions of SEBI Regulations and SEBI Investor Protection Guidelines, etc. are complied with and complaints/ grievances from shareholders and investors and those routed through Stock Exchanges or SEBI SCORES or Statutory authority(ies) are resolved/replied appropriately.

The policies formulated will be reviewed periodically to foster more dynamic, open and interactive corporate governance and thereby maximising shareholder value.