

Investor Servicing and Grievance Redressal Policy

Approved by Core Committee on Sustainability on 9.12.2022

Amended by Core Committee on Sustainability on 11.04.2024





INVESTOR SERVICING AND GRIEVANCE REDRESSAL POLICY-NOCIL LTD (NOCIL / the Company)

Background and Objective:

The Company is a publicly listed company whose Equity shares are listed on the Bombay Stock Exchange and the National Stock Exchange of India (collectively referred to as the Stock Exchanges). The Company thus has public shareholders (hereinafter referred to as the Investors) comprising of individuals, Companies, Bodies Corporate, Financial Institutions, Banks (Govt as well as Pvt sector) Govt companies, Foreign Institutional Investors, Hindu United Families (HUFs), Trusts (Public as well as Pvt), Registered Societies, Limited Liability Partnerships, and all other entities, as may be permitted by the Law to hold shares.

The objective and Rationale of the Policy is:

- (i) To provide best- in- class services to the Investors and to avoid grievances and complaints to the Regulators, as stipulated, regulated and directed by the applicable Laws, Rules and Regulations including but not limited to the provisions of the Companies Act 2013 (as amended from to time) and the Rules and Regulations framed thereunder and the provisions of the SEBI Act, 1992 (as amended from time to time) and the Rules and Regulations framed thereunder.
- (ii) To provide efficient services to the investors and to effectively address and redress the grievances of the investors in a timely manner.
- (iii) To promote and build prompt Investor Grievance redressal mechanism and investor friendly relations





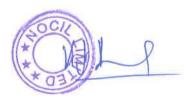
Scope of Investor servicing

"Investor servicing" includes (but *is not limited to*) the following activities whether performed by the Company or by Registrar & Share Transfer Agent (RTA) appointed by the Company in accordance with the provisions of the applicable SEBI Regulations. The Company has appointed M/s. Kfin Technologies Limited ("KFintech") as its Registrar and Transfer agents (RTA). The RTA is primarily responsible for handling security holders related affairs i.e., matters related to transmission and other shareholders /Investors Grievance related activities.

Investor Grievances

"Investor grievances" includes (but is not limited to) complaints, correspondence, queries, follow ups, reminders by the Investors escalated to/ raised with/issued to the Company, RTA and /or the Regulators including SEBI/Stock Exchanges/Other Regulatory bodies regarding:

- Requests for dematerialization of shares.
- Requests for issuance of duplicate share certificates /Transmission of shares/ Nomination.
- Non receipt of dividend.
- Non-Annual Reports, Postal Ballot, Notices of General Meetings.
- Non processing of requests relating to Investor Education & Protection Fund (IEPF).





Control Mechanism for redressal of Investor Grievances

- (1) The primary responsibility for the first point of reference for the Investors in case of grievances is the RTA, whose details and contact persons are made available by the Company through its website (www.nocil.com), websites of the stock Exchanges(https://www.nocil.com/, website of the stock Exchanges(https://www.bseindia.com/ and <a href="http
- (2) In case of delay or non-redressal of the grievances by the RTA within the prescribed time frames, the investors are free to approach the Company directly through a dedicated email id investorcare@nocil.com . These mails are directed to the Company Secretary who is appointed by the company to act as the Compliance Officer of the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"). As the 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. Any grievance or complaint from any investor is immediately taken on record by the Company Secretary and he directs the RTA to resolve the matter on urgent basis and within a short time frame. The staff of the Company Secretary's Dept (Secretarial Department) oversees the activities of the Registrar and Transfer Agents to ensure timely transmission and demat of shares and prompt service in investor related matters.



- (3) Any complaint escalated to the Regulators including SEBI or the Stock Exchanges by any investor is to be <u>immediately resolved</u> by the RTA (under advice to the Company Secretary) and the status of resolution is monitored by the Secretarial dept.
- (4) The Company Secretary has regular interaction over calls and video calls with the RTA staff to keep control over and follow up rigorously on the status of resolution of the investor grievances from time to time.
- (5) The Company engages the services of a Practicing Company Secretary firm to carrying out Reconciliation of Share Capital Audit, Audit of delivery of share certificates within the prescribed time limit in pursuance of statutory requirements and also to report on adherence to the regulatory time frames being followed by the RTA while responding to investors.
- (6) The RTA is also subjected an independent systems audit by an independent CA Firm engaged as per SEBI directions and the report therein with the Action taken report on the deviations is forwarded to NOCIL.
- (7) The Stake holders Grievances Committee is a dedicated Board committee constituted by the Board of NOCIL to oversee the control mechanism over the RTA functioning and the audit reports of the RTA are presented to this committee for review. The Committee also invites the RTA officials through video calls during its meetings to take a first-hand account of its services towards investors.
- (8) The RTA is bound to furnish the Status Reports periodically in respect of various correspondences and complaints received from the investors.





(9) All the investor complaints/grievance received online through "SEBI Complaints Redress System" (Scores) are checked regularly and replied/resolved expeditiously.

Policy Adherence Responsibility:

The Company Secretary / 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.

This Policy will be reviewed periodically to foster more dynamic, open, and interactive corporate governance and thereby maximising shareholder value.

Contact Details:

	Contact details	Address
For share related matters	KFIN Technologies Limited Email: einward.ris@kfintech.com	Selenium Tower B Plot31 – 32, Gachibowli, Financial District, Nanakramguda, Hyderabad – 500032 Tel Nos: 040 -67162222 Fax Nos: 040 - 23431551
For IEPF related matters	Mr. Amit K. Vyas Nodal officer Nocil Limited Email: amit.vyas@nocil.com investorcare@nocil.com	Mafatlal House, H.T. Parekh Marg, Backbay Reclamaton, Mumbai 400 020. Tel: 91-22-66364062 Fax: 97-22-66364060

