

**Keynote Financial Services Limited
Investor Grievance Redressal Policy**

1. Preamble and Objective

- 1.1. This Investor Grievance Redressal Policy ("Policy") has been formulated to provide a system for effectively registering, addressing, resolving and redressing the grievances of the investors of Keynote Financial Services Limited ("Company") in a timely manner.
- 1.2. The Company has appointed a qualified Company Secretary whose details are provided below to act as the Compliance Officer of the Company in terms of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"). The Compliance Officer of the Company shall be responsible for, inter-alia, monitoring the e-mail addresses of the Company specifically designated for the purpose of registration of complaints/ grievances by the investors.
- 1.3. The Company has appointed MUFG Intime India Private Limited (earlier Link Intime Private Limited), Mumbai as its Registrar & Share Transfer Agent ("RTA") having Registration No. INR000004058, which is primarily responsible for handling investor related affairs of the Company and ensuring faster and efficient provision of services to the investors.

2. Principles of the Policy

- 2.1. The grievances/ complaints raised by investors shall be dealt with promptly, fairly and effectively within the time prescribed under various regulations.
- 2.2. The Company shall not discriminate in addressing and resolving the grievances of the investors.
- 2.3. The investors shall be fully informed of the avenues to escalate their complaints/ grievances within the Company and under applicable law if they are not fully satisfied with the responses received.

3. Classification of Investor Communication

- 3.1. The Company receives shareholder investor communication in relation to, inter-alia, transfer/transmission/ transposition of securities, splitting of share certificates, consolidation of share certificates, re-materialization and dematerialisation of securities, issue of new/ duplicate certificates/ letter(s) of confirmation, deletion of name, non-

receipt of declared dividends, notices and annual reports/ requesting for some information/ details on dividend announced and not received etc. Such communication may either be in the form of complaints or mere queries/ information requests. Queries asking for information would be segregated for this policy from grievances or queries. The Compliance Officer or the Operational Head for handling these communications or someone else as the Chairman and Managing Director (CMD) is empowered to so authorise can make the decision for such classification. Any queries on Unpublished Price Sensitive Information (UPSI) including from media would be dealt with by the Compliance Officer or the CFO or such other person as the CMD considers appropriate.

- 3.2. In case of any ambiguity, the Compliance Officer of the Company is authorized to decide the nature and classification of the communication, and the decision of the Compliance Officer in this regard shall be final and binding.
- 3.3. All data on both segments of communications will be periodically (at least quarterly) presented to the Stakeholders' Committee of the Board.

4. Grievance Redressal Mechanism

- 4.1. The investors can lodge their request/ complaint by giving complete details of their name, folio no., DP ID/ Client ID, nature and full particulars of the request/ complaint directly to the RTA except for matters related to shares/ dividend or other amounts that have been transferred to the Investor Education and Protection Fund ("IEPF"). For IEPF related matters, investors are required to directly contact the Nodal Officer/ Deputy Nodal Officer appointed by the Company for this purpose at the address/ e-mail id mentioned below. It is clarified that in the event that the investors require a copy of their proof of entitlement for purpose of making form filings in relation to IEPF matters, they can request for the same from the RTA.
- 4.2. Any information in addition to the information furnished by the investor, or any supporting documentation required for redressal of the complaint shall be informed to the investors by the RTA or the Nodal Officer, as the case maybe. 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.
- 4.3. Subject to any statutory timelines that may be prescribed for redressal of any investor grievance,

- (i) the RTA shall endeavour to adhere with the following turnaround timelines in respect of investor requests/ complaints:
 - (a) Matters such as change of address, non-receipt of annual report/ notices of general meetings and updating of bank details to be addressed by the RTA within a period of 10 days from the receipt of the request/ complaint, or in case any supporting documents are required by the RTA for effectively addressing the request/ complaint, within a period of 10 days from the receipt of such supporting documents to the RTA's satisfaction; and
 - (b) Matters other than those referred in (a) above to be addressed by the RTA within a period of 15 working days from the receipt of the request/ complaint, or in case any supporting documents are required by the RTA for effectively addressing the request/complaint, within a period of 15 days from the receipt of such supporting documents to the RTA's satisfaction. The RTA will be monitored by the Company.
 - (ii) The Nodal Officer shall endeavour to resolve the requests/ complaints in relation to IEPF matters as expeditiously as possible and within such time period as may be prescribed under applicable law. In case unclaimed dividend of shareholders has been transferred to IEPF, the shareholders are guided with the procedure and the list of documents required to be submitted online to the IEPF Authority as prescribed under the applicable laws from time to time. For ease of reference, the current procedure and document requirements in this regard have been set out in Annexure A to this Policy. Similarly, in case underlying shares have been transferred to IEPF, then the shareholders are guided with the procedure and the list of documents required to be submitted online to the IEPF Authority as prescribed under the applicable laws from time to time. For ease of reference, the current procedure and document requirements in this regard have been set out in Annexure B to this Policy.
- 4.4. Status reports are obtained periodically by the Company from the RTA in respect of the complaints received by them.
- 4.5. In case of failure on the part of the RTA to respond to any request/ complaint or unsatisfactory response from the RTA within the aforementioned stipulated time periods, the investors may lodge their complaints/ grievances with the Company through the following persons at their e-mail addresses:

Ms. Simran Kashela – investors@keynoteindia.net, for requests/ complaints in respect of all other matters including all matters relating to retail shareholders/ dividend payments and corporate governance; and

Alternatively, the investors may send their complaints by post, addressed to the aforementioned persons at the address mentioned hereinafter. Only complaints sent in the manner set out in this Policy shall be treated as valid complaints under the Policy.

- 4.6. The Company shall endeavour to resolve the investor complaints received by it at the earliest and in any case within 15 days of receipt of the same by the Company, or in case any supporting documents are required by the Company for effectively addressing the complaint, within a period of 15 days from the receipt of such supporting documents to the Company's satisfaction, or within such time period as may be prescribed under applicable law in respect of a specific matter.
- 4.7. Investors are requested not to send multiple reminders during the abovementioned turnaround periods. Multiple communications, reminders or complaints received from the same investor in respect of the same matter within the stipulated turnaround periods shall be treated as a single request/ complaint.
- 4.8. In the event, the investor is not satisfied from the response received from the Company, the investor may lodge his/ her complaint through Securities and Exchange Board of India's Complaints Redress (SCORES) platform or through the SMART ODR Portal (Securities Market Approach for Resolution through ODR Portal).
- 4.9. The RTA and the Company shall take immediate efforts to resolve the complaint within 21 days of receiving the same through SCORES/ SMART ODR or as may be otherwise prescribed under applicable law.
- 4.10. In the event, the investor is not satisfied with the redressal, then such an investor may, within 15 days from the date of closure of his complaint in SCORES, opt for getting the complaint reviewed under the 'Compliant Review Facility' under SCORES, pursuant to which the complaint shall be escalated.
- 4.11. A statement containing details about the number of investor complaints (a) pending at the beginning of the quarter, (b) received during the quarter, (c) disposed of during the quarter, and (d) remaining unresolved at the end of the quarter, shall be placed, on quarterly basis,

before the Stakeholders Relationship Committee and the Board of the Company.

- 4.12. Further, the statement of investor complaints shall be filed with the stock exchanges where the securities of the Company are listed, on a quarterly basis, within 30 days from the end of each quarter, in compliance with the Listing Regulations.

5. Contact Details

- 5.1. The following contact details for purposes of making investor requests/ complaints would also be displayed on the Company's website:

Sr. No.	Name of Contact	Contact Details
1.	MUFG Intime India Private Limited (formerly Link Intime India Private Limited)	Email: rnt.helpdesk@linkintime.co.in 101, 247 Park L B S Marg, Vikhroli (West), Mumbai – 400 083 Phone No.: 022 49186000
2.	Ms. Simran Kashela Company Secretary and Compliance Officer	Email: investors@keynoteindia.net The Ruby, 9th floor, Senapati Bapat Marg, Dadar (West), Mumbai – 400 028 Phone No. : 022 6826 6000

Annexure A

1. The shareholder (or the claimant) claiming unclaimed dividend or other amounts must download the Web Form IEPF-5 available on the website of IEPF (<http://www.iepf.gov.in>) for filing the claim for refund.
2. The claimant must read the instructions provided on the website/ instruction kit along with the e-form carefully before filling the form. After filling the form along with fee specified by the IEPF Authority from time to time in consultation with the Central Government, the claimant must save the duly filled in form on the computer and submit the same by following the instructions given in the upload link on the website. On successful uploading of the form, an acknowledgement will be generated indicating the SRN. Please note the SRN for future tracking of the form.
3. The claimant must take a printout of the duly filled Web Form IEPF-5 and the acknowledgement issued after uploading the said form.
4. The claimant must submit the following documents to Mr. Bharat Madan (Nodal Officer (IEPF) of the Company) or Ms. Simran Kashela – Company Secretary and Compliance Officer (Deputy Nodal Officer (IEPF) of the Company) at the Company's registered office in an envelope marked 'Claim for refund from IEPF Authority' for verification of the claim:
 - (i) print out of duly filled and uploaded claim Web Form IEPF-5 with claimant signature and if joint holders are involved then the form should be signed by all the joint holders;
 - (ii) copy of acknowledgement generated after uploading Web Form IEPF-5;
 - (iii) indemnity bond (in original) with claimant signature (as per the instruction kit for Web Form IEPF-5) to be executed:
 - (a) on a non-judicial stamp paper of the value as prescribed under the relevant State Stamp Act if the amount of the claim is INR 10,000 or more; or
 - (b) on a plain paper if the amount claimed does not exceed INR 10,000;

- (iv) advance stamped receipt (in original) with signature of the claimant and two witnesses (as per the instruction kit for Web Form IEPF-5);
 - (v) in case of refund of matured deposit or debenture, or bonds;
 - (vi) copy of Aadhaar card of the claimant and if joint holders are there, then copies of the Aadhar cards of all the joint holders;
 - (vii) proof of entitlement (certificate of share/interest warrant/dividend warrant, application no. etc.);
 - (viii) original cancelled cheque leaf;
 - (ix) copy of passport, OCI and PIO card in case of foreigners and NRI;
 - (x) copy of PAN card;
 - (xi) client master list of DEMAT account of the claimant;
 - (xii) in case any joint holder is deceased, then copy of the death certificate; and
 - (xiii) other optional documents, (if any).
5. The Company shall, within 15 days from the date of receipt of the claim, send an e-verification report to the IEPF Authority in the format specified by the IEPF Authority along with all the documents submitted by the claimant. In case of non-receipt of documents by the IEPF Authority after the expiry of 90 days from the date of filing of Web Form IEPF-5, the IEPF Authority may reject the Web Form IEPF-5, after giving an opportunity to the claimant to furnish a response within a period of 30 days.
6. After verification of the entitlement of the claimant to the amount claimed, the IEPF Authority and then Drawing and Disbursement Officer of the IEPF Authority shall present a bill to the Pay and Accounts Office for e-payment as per the guidelines.
7. An application received for refund of any claim duly verified by the Company shall be disposed off by the IEPF Authority within 60 days from the date of receipt of the verification report from the Company, complete in all respects and any delay beyond 60 days shall be recorded in writing specifying the reasons for the delay and the same shall be communicated to the claimant in writing or by electronic means.

8. In cases, where the application is incomplete or not approved, a communication shall be sent to the claimant and the Company by the IEPF Authority detailing deficiencies of the application. In case of non-receipt of rectified documents by the IEPF Authority after the expiry of 90 days from the date of such communication, the IEPF Authority may reject Web Form IEPF-5, after giving an opportunity to the claimant to furnish response within a period of 30 days.
9. In case, the claimant is a legal heir or successor or administrator or nominee of the registered share holder, he has to ensure that the transmission process is completed by the Company before filing any claim with the IEPF Authority.
10. In case, the claimant is a legal heir or successor or administrator or nominee of any other registered security or in cases where request of transfer or transmission of shares is received after the transfer of shares by the Company to the IEPF Authority, the Company shall verify all requisite documents required for registering transfer or transmission and shall issue letter to the claimant indicating his entitlement to the said security and furnish a copy of the same to the IEPF Authority while verifying the claim of such claimant.
11. The claimant shall file only one consolidated claim in respect of a company in a financial year.

1. The shareholder (or the claimant) claiming shares must download the Web Form IEPF-5 available on the website of IEPF (<http://www.iepf.gov.in>) for filing the claim for refund.
2. The claimant must read the instructions provided on the website/instruction kit along with the e-form carefully before filling the form. After filling the form along with fee specified by the IEPF Authority from time to time in consultation with the Central Government, the claimant must save the duly filled in form on the computer and submit the same by following the instructions given in the upload link on the website. On successful uploading of the form, an acknowledgement will be generated indicating the SRN. Please note the SRN for future tracking of the form.
3. The claimant must take a printout of the duly filled Web Form IEPF-5 and the acknowledgement issued after uploading the said form.
4. The claimant must submit the following documents to Mr. Bharat Madan (Nodal Officer (IEPF) of the Company) or Ms. Simran Kashela – Company Secretary and Compliance Officer (Deputy Nodal Officer (IEPF) of the Company) at the Company's registered office in an envelope marked 'Claim for refund from IEPF Authority' for verification of the claim:
 - (i) print out of duly filled and uploaded claim Web Form IEPF-5 with claimant signature and if joint holders are involved then the form should be signed by all the joint holders;
 - (ii) copy of acknowledgement generated after uploading Web Form IEPF-5;
 - (iii) indemnity bond (in original) with claimant signature (as per the instruction kit for Web Form IEPF-5) to be executed in case of refund of shares, on a non-judicial stamp paper of the value as prescribed under the relevant State Stamp Act;
 - (iv) advance stamped receipt (in original) with signature of the claimant and two witnesses (as per the instruction kit for Web Form IEPF-5);
 - (v) in case where shares (in physical form) are claimed original certificate thereto;

- (vi) copy of Aadhaar card of the claimant and if joint holders are there, then copies of the Aadhar cards of all the joint holders;
 - (vii) proof of entitlement (certificate of share/interest warrant/dividend warrant, application no. etc.);
 - (viii) original cancelled cheque leaf;
 - (ix) copy of passport, OCI and PIO card in case of foreigners and NRI;
 - (x) copy of PAN card (mandatory in case of claim for shares);
 - (xi) client master list of DEMAT account of the claimant;
 - (xii) in case any joint holder is deceased, then copy of the death certificate; and
 - (xiii) other optional documents, (if any).
5. The Company shall, within 15 days from the date of receipt of the claim, send an e-verification report to the IEPF Authority in the format specified by the IEPF Authority along with all the documents submitted by the claimant. In case of non-receipt of documents by the IEPF Authority after the expiry of 90 days from the date of filing of Web Form IEPF-5, the IEPF Authority may reject the Web Form IEPF-5, after giving an opportunity to the claimant to furnish a response within a period of 30 days.
6. After verification of the entitlement of the claimant to the shares claimed, the IEPF Authority shall issue a refund sanction order with the approval of the Competent Authority and shall credit the shares to the DEMAT account of the claimant to the extent of the claimant's entitlement.
7. An application received for refund of any claim duly verified by the Company shall be disposed off by the IEPF Authority within 60 days from the date of receipt of the verification report from the Company, complete in all respects and any delay beyond 60 days shall be recorded in writing specifying the reasons for the delay and the same shall be communicated to the claimant in writing or by electronic means.
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