

NALWA SONS INVESTMENTS LIMITED

CIN:L65993DL1970PLC146414

Corporate Office: Jindal Centre, 12, Bhikaiji Cama Place, New Delhi – 110066

Registered Office: 28, Najafgarh Road, Moti Nagar, Industrial Area, New Delhi-110015

Branch Office: O.P. Jindal Marg, Hisar-125005, Haryana

T: +91 11 45021854, 45021812 E: investorcare@nalwasons.com

Website: www.nalwasons.com

INVESTORS' GRIEVANCE POLICY

(Approved by the Board of Directors on May 30, 2023)

1. Objective

Nalwa Sons Investments Limited (hereinafter referred to as 'NSIL' or 'the Company') is committed to providing a transparent, effective, and efficient mechanism to investors for addressing and resolving their grievances.

2. Scope and Applicability

- The policy is applicable to grievance redressal related to all securities issued by Nalwa Sons Investments Limited, which are listed on the stock exchanges in India.
- Pursuant to various statutes and by virtue of investment through shares or debentures in the Company, the investors enjoy several rights, which inter-alia include the right to receive the following:
 - a) Security certificates pursuant to transfer, transmission, split etc.,
 - b) Any dividend / coupon payment on the shares /debentures,
 - c) Annual reports and AGM notice, and
 - d) Such other rights available under law for the time being in force.

3. Definitions

For this Policy, the following carry the meaning as under:

- "Board" means the Board of Directors of Nalwa Sons Investments Limited.
- "SCORES" is a web-based centralized grievance redressal system of SEBI (<http://scores.gov.in>), which enables the investors to lodge and track the status of redressal of such complaints online.
- "Stipulated turnaround time" means the timelines as specified in the Investor Service Timelines section of this Policy.
- "Investors" mean shareholders or debenture holders of the company

The words and phrases not defined under this Policy will carry the same meaning as defined under the Articles of Association of the Company, the Securities and Exchange Board of India Act, 1992 read with the rules and regulations made thereunder, including the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Companies Act, 2013 read with the rules made thereunder.

4. Grievance Redressal Mechanism

The Board has appointed the Company Secretary to act as the Compliance Officer of the Company under the SEBI (Listing Obligations and Disclosure Requirements)

Regulations, 2015 and as Nodal officer of the Company under Investor Education and Protection Fund (IEPF) provisions of the Companies Act, 2013.

As Compliance Officer, the Company Secretary is responsible for ensuring provision of prompt and effective services to investors and monitoring the dedicated email address of the Company for investor grievances.

The Company has appointed M/s. Link Intime India Private Limited as its Registrar & Transfer Agent (“RTA”) to ensure faster and efficient provision of services to the investors.

5. Steps to be followed by the investor for raising queries/ grievances

Investors can lodge a complaint by giving details of their name, folio no., DP ID / Client ID, nature, and full particulars of their complaint directly to the RTA, except for matters relating to shares / dividend transferred to IEPF. For IEPF-related matters, investors can directly contact the Nodal Officer appointed by the Company as specified under the Contact Details of the Company’s website.

Any information or supporting documentation required for redressal of the complaint shall be informed by RTA to the investors. Investors are requested to furnish all the requisite information along with duly executed documents at the earliest to avoid any delay in the redressal of their complaints.

In case of a non-satisfactory response from RTA or non-receipt of response within the stipulated timeline, investors can also lodge complaint through the Company’s designated email id for investor grievances - investorcare@nalwasons.com.

Investors are requested to approach the RTA, or in case of any inaction by the RTA, the Company, for redressal of their concerns before raising their concerns with the regulatory authorities.

Only complaints sent to the email ids mentioned in this Policy will be treated as valid complaints.

6. Steps followed by the Company for handling investor queries/ grievances

Upon receipt of grievance on the designated contact details, the Company has an established mechanism for handling of investor grievances.

- Status Report is obtained periodically from RTA in respect of various correspondences and complaints received by the Company directly or by RTA.
- The Compliance Officer accesses the designated email id on a regular basis to check any new complaint or request received from investors.

- The Compliance Officer reviews all information available on the complaint and request for additional information, which is considered necessary for a proper resolution of the grievance.
- The Compliance Officer is primarily responsible to resolve the complaint. While resolving the complaint, the Compliance officer may liaise with other relevant departments.
- Compliance Officer will escalate the complaint to senior management if the complaint is unresolved.
- All the investor complaints/ grievances received through the “SEBI Complaints Redress System” (SCORES Portal) are being attended to and resolved expeditiously.

7. Contact Details

Matter	Responsibility	Contact details	Address
For matters related to Shareholding and dividend	Registrar & Transfer Agent (Primary responsibility for investor requests, service, complaints)	delhi@linkintime.co.in Escalation Point: In case of a non-satisfactory response from RTA or non-receipt of response within the stipulated timeline, investors can also lodge complaint through the Company’s designated email id for investor grievances - investorcare@nalwasons.com.	Mr. V.M. Joshi, Vice President Link Intime India Private Limited Noble Heights, 1st Floor, Plot No. NH 2, LSC, C-1 Block, Near Savitri Market, Janakpuri New Delhi-110058 Tel. No.: 011 41410592/ 93/ 94 https://www.linkintime.co.in
Corporate Governance, Secretarial related matters	Company Secretary and Compliance Officer	investorcare@nalwasons.com	Mr. Ajay Mittal Company Secretary and Compliance Officer Tel. No.: +91 1662 222471-83

IEPF Nodal Officer	Executive Director & C.E.O.	rakeshgarg@jindalstainless.com	Mr. Rakesh Kumar Garg Executive Director & C.E.O. Tel No. 011 41462128
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8. Investor Service Timelines

The Company and its RTA shall follow the following timelines for performance of its duties towards investors:

- a. Requests for change of address, non-receipt of annual reports, notice of general meetings and updating of bank details (for holdings in physical form) are addressed by the RTA within a period of 7 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 7 working days from the receipt of such documents to the RTA's satisfaction.
- b. Requests for transfers/ transmission/ duplicate share certificates, change of name, dematerialization, and loss of share certificates and other matters not specified in (a) above, are addressed by the RTA within a period of 7 to 15 days from the receipt of all necessary information/ documents from the investors. In case any supporting documents are required by the RTA from the investor or any other party for addressing the request, such matters shall be addressed within a period of 15 days from the receipt of such documents to the RTA's satisfaction.
- c. Request received from investor who are holder of physical security certificates for various service request and complaints including but not limited to:
 - i. Intimation of / updation of / change in Permanent Account Number, Nominee, Bank details, Contact details, Signature, Name etc.;
 - ii. Processing of investor requests (Duplicate security certificates, folio consolidation, transmission, transposition etc.);
 - iii. Services through depository participants such as dematerialization, re-materialization etc.

Are required to submit their documents within 30 days from the date of request. Investor request will be closed if physical documents are not received within 30 days and in such case, the investor will have to raise a fresh request. It is pertinent to note that investor service requests which require submission of physical documents, will considered and taken up for processing by RTA only after receipt of physical documents.

In case statutory timelines for redressal of any grievance are not specifically mentioned here, the Company / RTA shall address such grievance within the timeline as prescribed under law.

9. Classification of investor communication

Multiple correspondence / communications or reminders received for the same matter within the stipulated turnaround time for handling of query / communication shall be treated as a grievance.

If a query is resolved after the stipulated Turnaround Time and there is no reminder from the investor during such period, the query shall not be treated as a complaint.

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.

10. Governance

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

11. Reporting

Under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, listed entity files with the recognised stock exchange(s) within twenty one days from the end of each quarter number of investor complaints pending at the beginning of the quarter, the number of investor complaints received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter. The Company also places this to the Board of Directors on a quarterly basis.

A Status report is obtained periodically from RTA in respect of various correspondences and complaints received by the Company directly or by RTA and it is placed before the Stakeholders Relationship Committee from time to time.

12. Review of Policy

The Investors' Grievances Redressal Policy shall be reviewed periodically or in case of a change in regulations, whichever is earlier.