

INVESTOR GRIEVANCE REDRESSAL POLICY

TITLE

This Policy shall be called 'Investor Grievance Redressal Policy'.

EFFECTIVE DATE

This Policy has been adopted by the Board of Directors of Systematix Corporate Services Limited ('the Company') at its Meeting held on 29th May, 2018 upon the recommendation of Stakeholders Relationship Committee.

PREAMBLE AND OBJECTIVE

- a. This Policy is formulated to provide efficient services to the investors and to effectively address and redress the grievances of the investors in a timely manner.
- b. This Policy was recommended by the Stakeholders Relationship Committee of the Board in its meeting held on 29th May, 2018.
- c. The Company's equity shares are listed on BSE Limited, Mumbai only.
- d. The Company has appointed Cameo Corporate Services Limited as its Registrar & Transfer Agents ("**RTA**") to ensure faster and efficient provision of services to the investors. The RTA is primarily responsible for handling shareholders related affairs of the Company.
- e. The Board has appointed the Company Secretary to act as Compliance Officer of the Company under the Securities and Exchange Board of India (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.

DEFINITION

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

- a. "**Board**" means the Board of Directors of Systematix Corporate Services Limited.
- b. "**Company**" means Systematix Corporate Services Limited.

- c. **“Complaint or Grievance”** means an expression of dissatisfaction made by the Investor of the Company related to the services rendered by us and/ or Client.
- d. **“Client or Customer”** means client/ customer of the Company for which the assignment or work is undertaken by us in the capacity as a Merchant Banker.
- e. **“Investors”** mean an individual, entity, body corporate or such other person who shall be an investor in securities of the Company or would be investing in securities of our 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 SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015; and the Companies Act, 2013 read with the rules made thereunder.

THE KEY STEPS UNDERTAKEN BY THE COMPANY FOR HANDLING INVESTOR GRIEVANCES ARE AS FOLLOWS -

- The Company has a designated mail id secretarial@systematixgroup.in for handling investor grievances on which investor can make Complaint. This email id is mentioned on the Website of the Company.
- All the investor complaints/grievance received through SEBI by online “SEBI Complaints Redress System” (SCORES) checked/monitored regularly and replied/resolved expeditiously to provide quick and timely redressal.
- Any complaint mails received from client shall be immediately forwarded to the specific department for their review and for them to report and resolve the issues, if any at earliest.
- Any mail received from investor is forwarded to RTA immediately. Investors are requested to furnish all the requisite information alongwith duly executed documents at the earliest to avoid any delay in redressal of their complaints. Any information, other than those specified above or any supporting documentation required for redressal of the complaint shall be informed to the investors by the RTA.
- Secretarial Department independently checks and evaluates the complaint of Investor and obtains all the information available on the complaint which is considered necessary for proper investigation and also looks into necessary information and undertakes to resolve them as soon as possible. Status Report is obtained periodically from RTA of the Company in respect of any

complaints from investors and the same is placed before the Stakeholders Relationship Committee ("SRC").

- Cameo Corporate Services Limited, RTA of the Company is primarily responsible for discharging investor services function, effectively, efficiently and expeditiously including transfer, transmission, transposition, nomination, dividend, change of name / address / signature, registration of mandate / Power of Attorney, replacement / DEMAT / REMAT of shares.
- Investors can lodge a complaint for non-receipt of any right available to them or failure of the RTA / Company to comply with any statutory obligation 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 Investor Education and Protection Fund (IEPF). For IEPF related matters, investors can directly contact the Compliance Officer, appointed by the Company as specified under the Contact Details section of this Policy.
- Only complaints (excluding general enquiry and requests) sent on the addresses / email ids mentioned in this Policy will be treated as valid complaints.
- The Stakeholders Relationship Committee (SRC) is responsible for the examination and redressal of the complaints by investors.
- As required under Regulation 13 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company files with the Stock Exchange and places the statement of investor complaints at the Board meeting on a quarterly basis. Further, the Company also makes annual disclosure of the statement of investor complaints in its annual report pursuant to the Listing Regulations.
- If any investor complaint received and cannot be resolved by the Compliance Officer, the same will be escalated to the Senior Management.
- If an investor is not satisfied with the resolution provided through various channels or the method of handling complaint; the investor can escalate the issues to the next higher level i.e. to the Managing Director of the Company. Such escalation should be made in writing and should be delivered in the hard copy to the Corporate Office of the Company.
- All complaints (excluding general enquiry and requests) received shall be recorded internally including how the same has been resolved.

INVESTOR SERVICE TIMELINES

General Turnaround Time (TAT) for response to complaint is (from the receipt of the valid complaint in writing):

- Allotment/ Refund related – 10 working days
- Legal notices – 30 working days
- Cases involving third party- 30 working days
- Fraud related – 45 working days
- All other cases- 30 working days
- Scores related- as specified by the regulator from time to time

Note: The above TAT can change depending upon the nature and complexity of complaint.

FILING COMPLAINTS ON SCORES – EASY AND QUICK

- a. Register on SCORES Portal (<https://www.scores.gov.in/scores/complaintRegister.html>)
- b. Mandatory details for filing complaints on SCORES : Name, PAN, Address, Mobile Number, E-mail ID
- c. Benefits: 1) Effective Communication 2) Speedy redressal of the grievances

CONTACT DETAILS

| | Contact Details | Address |
|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| For share related Matters | Cameo Corporate Services Limited, Registrar & Transfer Agent Email: investor@cameoindia.com | Cameo Corporate Services Limited Unit: Systematix Corporate Services Limited Subramanian Building, No.1, Club House Road, Chennai - 600002. Tamilnadu. Tel No.: +91-44 – 284 60390 (5 Lines) |

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| For IEPF related Matters | <p>Vrunda Dhanesha Company Secretary and Compliance Officer</p> <p>Email: secretarial@systematixgroup.in</p> | <p>Systematix Corporate Services Limited Secretarial Department</p> <p>Corporate Office: The Capital, A Wing, 6th Floor, No. 603-606, Plot No. C-70, 'G' Block, Bandra-Kurla Complex, Bandra (East), Mumbai - 400 051.</p> <p>Tel No.: +91-22-6619 8000 / 3029 8000; Fax No.: +91-22-6619 8029 / 3029 8029</p> |
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MISCELLANEOUS

- The Stakeholder Relationship Committee of the Company is authorised to amend or modify the Policy to give effect to any changes / amendments notified by the Ministry of Corporate Affairs or SEBI. The amended Policy shall be placed before Board of Directors for approval, noting or ratification.
