

# **SRG HOUSING FINANCE LIMITED**



## **INVESTOR GRIEVANCE REDRESSAL POLICY**

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The purpose of this document is to provide efficient services to the investors and to effectively address and redress the grievances of the investors in a timely manner.

## I. INTRODUCTION

This policy is aimed at minimizing instances of Investor Complaints and grievances through proper service, delivery and review mechanism and to ensure prompt Redressal of Investor Requests, Complaints and Grievances.

SRG Housing Finance Limited (SRGHFL) (“the Company”) believes in and complies with the prevalent Investor grievance redressal policy(IGRP) that are in line with Articles of Association of the Company; Securities and Exchange Board of India Act, 1992 read with the rules and regulations made thereunder, Listing Regulations; and the Companies Act, 2013 read with the rules made thereunder.

This is living document and supposed to be updated on a regular basis. Any regulatory change that would impact the IGRP aspects of the company would be reflected here.

## II. GOVERNING LAWS

This policy shall be governed by applicable provisions of Companies Act, Securities Exchange Board of India Act, and including rules, regulations mentioned thereunder.

## III. SHORT TITLE

This policy may be known as **“Investor Grievance Redressal Policy”**.

## IV. DEFINITIONS

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

- a. **“Board”** means the Board of Directors of SRG Housing Finance Limited.
- b. **“Company”** means SRG Housing Finance Limited.
- c. **“stipulated turnaround time”** means the timelines as specified in the Investor Timelines section of this Policy.

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 Listing Regulations; and the Companies Act, 2013 read with the rules made thereunder.

## V. 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 approved by the Stakeholders Relationship Committee of the Board in its meeting held on 30<sup>th</sup> December, 2019.
- c. The Company’s equity shares are listed on BSE Limited.

d. Pursuant to various statutes and by virtue of their shareholding in the Company, shareholders enjoy several rights, which inter-alia include the right to (i) any dividend on the shares declared by the Company, (ii) annual reports and AGM notice, and (iii) such other rights available under law for the time being in force.

Note:- Company's 100% shares are in dematerialized form only.

e. The Company has appointed M/s. Sharex Dynamic (India) Pvt. Ltd. as its Share Transfer Agents ("STA") to ensure faster and efficient provision of services to the investors. The STA is primarily responsible for handling shareholders related affairs of the Company.

f. The Board has appointed the Company Secretary to act as Compliance Officer of the Company under the SEBI (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.

## **VI. INVESTOR SERVICE TIMELINES**

The Company and its STA follow the following timelines for performance of its duties toward shareholders: Matters such as change of address, non-receipt of annual report and any other statutory right of the shareholders are addressed by the STA **within a period of 15 days** from the receipt of the request. In case, any supporting documents are required by the STA from the shareholder or any other party for addressing the request, such matters will be addressed within a period of 15 days from the receipt of such documents to the STA's satisfaction.

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

## **VII. CLASSIFICATION OF SHAREHOLDER COMMUNICATION**

The Company receives various correspondence / communication from the investors relating to the shares, annual reports, dividends and ancillary matters. These communications may either be complaints or mere queries / requests by the shareholders. The Company presently follows a set of guidelines for classifying the shareholders' communication between general correspondence / requests / complaints, etc. These guidelines are internal to the Company.

The Company strives to follow highest standards of corporate governance, transparency and disclosures at all times. With a view to ensure greater transparency and as a part of Company's investor-friendly initiatives, the Stakeholders Relationship Committee has considered it appropriate and desirable to formally document the present guidelines w.r.t classification of shareholders' communication through this Policy.

In addition to the above, the Policy broadly defines its investor servicing timelines and further lays down the process for redressal of complaints and the escalation matrix thereof.

## **VIII. GENERAL PRINCIPLE GUIDING CLASSIFICATION OF SHAREHOLDERS' COMMUNICATION**

a. Multiple correspondence / communications or reminders received for the same matter within the stipulated turnaround time in this Policy for handling of the query / communication will be treated as one complaint.

b. If a query is resolved after the stipulated turnaround time and there is no reminder from the shareholder during such time period, such query will not be treated as complaint.

c. 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.

d. If the Request received from the shareholder only to the Company and not to the STA than the same will be forwarded by the Company to STA as soon as possible.

e. All the investor complaints/grievance received through SEBI by online “SEBI Complaints Redress System” (Scores) checked regularly and replied/resolved expeditiously.

d. Classification of shareholders’ communication

| Sr.No.   | Communication not treated as complaint   | Communication treated as complaint  |
|----------|--|---|
| <b>1</b> | <b>Non-receipt of annual report</b>  |   |
|          | <p>First request or any such communication with respect to non - receipt of annual report will be considered as a request if, the Company has dispatched the annual report to the shareholder on or before the due date(s) through permissible means.</p> <p>Such communication shall be treated as request for an additional copy of the annual report. Company shall verify the shareholders details and respond to the request accordingly.</p>   | <p>Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if,</p> <ul style="list-style-type: none"> <li>➤ the Company / STA has not dispatched the annual report to the shareholder on or before the due date(s), or</li> <li>➤ the Company / STA has not responded to shareholder’s request within the stipulated turnaround time.</li> </ul> |
| <b>2</b> | <b>Non-receipt of dividend</b>   |   |
|          | <p>First request or any such communication with respect to non-receipt of dividend will be considered as a query / request if, the Company has credited the dividend to the bank account of the shareholder or dispatched dividend warrants / demand drafts on or before the due date(s).</p> <p>When the Company is unable to pay out the dividend:</p> <ul style="list-style-type: none"> <li>➤ In case where the dividend is to be credited to the bank account of the shareholder, and such credit has been declined by the bank, the Company will pay out the dividend through a dividend warrant / demand draft in favour of the shareholder.</li> <li>➤ In case the dispatched dividend warrant / demand draft is returned undelivered, the Company will proceed with re-dispatching the</li> </ul> | <p>Any communication with respect to non-receipt of dividend warrants / demand drafts sent to the Company or to the STA after the expiry of the stipulated turnaround time for issuance of duplicate dividend warrant will be considered as complaint.</p>  |

|          |   |   |
|----------|---|---|
|          | dividend warrant / demand draft only upon a written request by the shareholder. Such communication from the shareholder will be treated as a request and not a complaint.   |   |
| <b>3</b> | <b>Shareholder communication through statutory authorities</b>  |   |
|          | <p>Any communication from investors through statutory authorities which:</p> <ul style="list-style-type: none"> <li>➤ is not treated as a complaint by the statutory authority, and</li> <li>➤ which would not have been treated as a complaint by the Company if it was directly addressed to the Company</li> </ul> <p>will not be treated as a complaint.</p> <p>As per SEBI circular dated March 26, 2018, any grievances submitted to SEBI through SCORES will not be treated as complaints if the grievance is redressed by the Company within 30 days. Accordingly, such grievances registered with SEBI, will be not treated as complaints by the Company.</p>  | <p>At times, requests / grievances are directly communicated to the statutory authorities by the investors. Such communications may not always qualify as a complaint under the guidelines adopted by the Company.</p> <p>However, since the statutory authorities treat all communication received from investors as complaint, regardless of the nature of such communication, the Company is constrained to follow the classification as followed by the statutory authorities.</p> <p>Accordingly, any communication from investors received through statutory authorities viz. stock exchanges, Registrar of Companies, Regional Directors, SEBI, etc. which is treated as complaint by such statutory authority, will be treated as a complaint by the Company.</p> |
| <b>4</b> | <b>Others</b>   |   |
|          | <p>i. Correspondence with respect to change in address, nominees etc will be considered as a request and not as a complaint if, the request is addressed within the stipulated turnaround time.</p> <p>ii. Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.</p> <p>iii. Any communication requisitioning information or documents relating to the Company or its operations as per statutory rights available to the shareholders will be treated as request if, the requisition is in proper format and the Company has responded to the same within prescribed time limits.<br/>(Further if any request requires payment as per specific law than the same payment will be accepted by the Company only in form of Demand Draft/Cheque along with proper Request letter and copy of</p> | <p>If any request of the shareholder raised with the supporting agreement and the same is not redressed within the statutory timeline than the same will be considered as the Complaint.</p> <p>Any document/information required by the shareholder which is not statutory right of the shareholder is not considered shall be treated as general request, and while redressing such quarries only such information can be provided to shareholders which are already in public domain and no information should not be unpublished price sensitive information.</p>   |

|  |   |  |
|--|---|--|
|  | the any. PAN)   |  |
|  | iv. Incomplete communications, communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint. |  |
|  | v. Communications / complaints in relation to matters that are subjudice will not be treated as a complaint under this Policy.  |  |

## IX. INVESTOR GRIEVANCE REDRESSAL MECHANISM

a. Investors can lodge a complaint for non-receipt of any right available to them or failure of the STA / 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 STA.

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 STA. 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.

Further for any complaint if there is any payment requires for the same by the Company as per the statutory laws than the same will be accepted by the Company in the mode of Demand Draft/Cheque in favour of SRG Housing Finance Limited, payable at Udaipur Rajasthan. The Request can only redress after Receiving DD/Cheque along with the copy of PAN of Investor and Request letter mentioning details such as ; name, folio no., DP ID / Client ID, PAN no, Address and nature and full particulars of their complaint. The same can be provided at SRG Housing Finance Limited, Registered office 321, S.M. Lodha Complex, Udaipur Rajasthan- 313001.

b. 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 STA. 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.

c. In case of non-satisfactory response from STA, investors can also lodge their complaints through the Company's designated email id for investor grievances - [info@srghousing.com/](mailto:info@srghousing.com/) [srghousing@gmail.com](mailto:srghousing@gmail.com). The designated email id is also displayed on the Company's website. Alternatively, investors can send their complaints at the corporate/registered office of the Company.

d. If the investor does not receive a reply from the STA within the stipulated turnaround time, he / she may approach the Company at the credentials mentioned above. Additionally, investors are urged to refrain from sending multiple reminders during the above-mentioned turnaround periods for redressal of their complaints.

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

f. The Company periodically obtains status report of the complaints from the STA.

g. The Stakeholders Relationship Committee is responsible for the examination and redressal of the complaints by investors.

h. As required under Regulation 13 of Listing Regulations, the Company files with the Stock Exchanges 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.

## **X. INVESTOR SERVICING AND GRIEVANCE REDRESSAL – EXTERNAL AGENCIES**

### **1. SEBI Complaints Redress System (SCORES)**

SEBI, in its endeavour to protect the interest of investors, has provided a platform wherein the investors can lodge their grievances. This facility is known as SEBI Complaints Redress System (SCORES) and is available on the SEBI website ([www.sebi.gov.in](http://www.sebi.gov.in)) and on SCORES' website (<http://scores.gov.in>).

The investor complaints are processed in a centralized web based complaints redress system. The salient features of this system are: Centralized database of all complaints, online upload of Action Taken Reports (ATRs) by the concerned companies and Online viewing by investors of actions taken on the complaint and its current status.

All companies against whom complaints are pending on SCORES, have to take necessary steps to resolve the complaint and submit action taken report within thirty days of receipt of complaint and also keep the complainant duly informed of the action taken.

SEBI has issued frequently asked questions (FAQs) in respect of SCORES which inter alia lists down the matters which are considered as complaints and handled by SEBI, the matters which are not considered as complaints, how the investor complaints' are handled by SEBI, the arbitration mechanism, etc. These FAQs can be accessed on the link: <http://scores.gov.in/Docs/FAQSCORES.pdf>.

### **2. Stock Exchanges**

BSE Limited (BSE) – BSE has provided an opportunity to the investors to file their complaints electronically through its website: [www.bseindia.com](http://www.bseindia.com) under the “Investor Grievances” section.

### **3. Ministry of Corporate Affairs (MCA)**

MCA has launched its e-Governance initiative, that is, MCA21, on the MCA portal ([www.mca.gov.in](http://www.mca.gov.in)). One of the key benefits of this initiative is timely redressal of investor grievances. MCA21 system accepts complaints under the e-Form prescribed, which has to be filed online.

The status of complaint can be viewed by quoting the Service Request Number (SRN) provided at the time of filing the complaint.



#### **4. Depositories**

National Securities Depository Limited (NSDL) – In order to help its clients resolve their doubts, queries, complaints, NSDL has provided an opportunity wherein they can raise their queries by logging on to: [www.nsdl.co.in](http://www.nsdl.co.in) under the “Investors” section or an email can be marked mentioning the query to: [relations@nsdl.co.in](mailto:relations@nsdl.co.in).

Central Depository Services (India) Limited (CDSL) - Investors who wish to seek general information on depository services may mail their queries to: [investors@cdslindia.com](mailto:investors@cdslindia.com). With respect to the complaints/grievances of the demat account holders relating to the services of the DP, e-mails may be addressed to: [complaints@cdslindia.com](mailto:complaints@cdslindia.com).

#### **XI. TRANSFER / TRANSMISSION**

Shares in demat can be transferred to another demat account by issuing appropriate instructions to depository participant (DP) through delivery instruction slip (DIS). If investor sell securities through the stock exchange, they will instruct their DP to transfer shares from their demat account to the brokers’ pool account. In case of off market transaction, they will instruct their DP to transfer to the concerned buyer’s demat account.

Similarly, securities can be transferred to investor’ demat account by the instruction of the seller (transferor) to his DP. The seller will have to mention buyer’s demat account number in the DIS.

The DIS book is similar to a cheque book and it needs to be handled with the same care as a cheque book.

The following precautions are to be taken in respect of DIS:

- Ensure that DIS numbers are pre-printed and DP takes acknowledgment for the DIS booklet issued to the investor.
- Ensure that the account number [client id] is pre-stamped or pre-printed.
- If the account is a joint account, all the joint holders have to sign the DIS. Instruction cannot be executed if all joint holders have not signed.
- Avoid using loose slips.
- Do not leave signed blank DIS with anyone viz., broker/ sub-broker, DPs or any other person/entity.
- Keep the DIS book under lock and key when not in use.
- If only one entry is made in the DIS book, strike out the remaining space to prevent misuse.
- Personally fill in target account-id and all details in the DIS.
  - If the DIS booklet is lost/stolen/not traceable, the same must be intimated to the DP, immediately, in writing. On receipt of such intimation, the DP will cancel the unused DIS of the said booklet.
- Do not issue / submit DIS without mentioning execution date.

#### **Transmission of securities**

In the event of death of a share his / her ownership rights can be passed on to the legal heir / nominee through a process known as transmission. The procedure for transmission of securities is as follows;

##### **1. In case of nominee:**

For shares in demat mode, nominee has to provide the following documents to the depository participant

- Notarized copy of the death certificate
- Duly filled Transmission Request Form (TRF)

2. In case there is no nomination:

Shares held in demat mode; where value of the shares does not exceed Rs. 5 lakh, one or more of the following documents is to be furnished to the DP;

- Notarised copy of the death certificate
- Transmission Request Form (TRF)
- Affidavit – to the effect of the claim of legal ownership to the shares,
- Deed of indemnity – Indemnifying the depository and depository participants (DP)
- NOC\* (no objection certificate) from legal heir(s), if applicable or family settlement deed duly executed by all legal heirs of the deceased beneficial owner.

Where value is more than Rs. 5 lakh, the DP may additionally insist on one or more of the following documents

- Surety form
- Succession certificate
- Probated will
- Letter of Administration

Note: The timeline for processing the transmission requests by the DP for securities held in dematerialised form is 7 days after receipt of the prescribed documents from the claimants/legal heirs.

**NOMINATION FACILITY:**

Since all the shares of the company are in demat form, shareholders are requested to contact their Depository Participants for availing nomination facility.

**XII. TRANSFER OF UNPAID / UNCLAIMED DIVIDEND / SHARES IN THE NAME OF INVESTOR EDUCATION AND PROTECTION FUND (IEPF) AUTHORITY:-**

Under the provisions of the Companies Act, 2013 dividends that remain unclaimed for a period of seven years from the date of declaration are required to be transferred to the Investor Education and Protection Fund (IEPF) administered by the Central Government.

Members who have either not received or have not encashed their dividend Cheques for the financial years 2014-2015 are requested to claim the unpaid dividend from the Company before transfer to the above mentioned fund.

Pursuant to section 125 of Companies Act, 2013 read with Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016 in case your shares, unclaimed dividend thereon have been transferred to IEPF, you can claim the same by making an application directly to IEPF in the prescribed form under the IEPF Rules which is available on the website of IEPF i.e. [www.iepf.gov.in](http://www.iepf.gov.in).

Dividends that have not been claimed by the shareholders for the financial year 2014-15 will have to be transferred to the Investor Education and Protection Fund in April, 2022 in accordance with the provisions of the Companies Act.

**Unclaimed Shares:**

In terms of the Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016 as amended, the Company will be arranging to transfer the corresponding shares to IEPF, where the dividends for the last seven consecutive years have not been claimed by the concerned shareholders. The concerned shareholders however may claim the dividend and shares from IEPF.

**Request to investors:**

Shareholders are requested to follow the general safeguards/procedures as detailed hereunder in order to avoid risks while dealing in the securities of the company.

As required by SEBI, it is advised that the shareholders furnish details of their bank account number and name and address of their bank for incorporating the same in the dividend warrants/Cheques etc. This would avoid wrong credits being obtained by unauthorized persons.

**XIII. MISCELLANEOUS**

**Change of address**

**What is the procedure to get change of address registered in the Company's records?**

As all Shares are held in dematerialised form, information about change of address needs to be sent to the DP concerned.

**Change of name**

**What is the procedure for registering change of name of shareholders?**

Shareholders holding shares in demat form, may request the concerned DP in the format prescribed by DP for effecting change of name.

**Authority to another person to deal with shares What is the procedure for authorizing any other person to deal with the shares of the Company?**

A shareholder needs to execute a Power of Attorney in favour of the concerned person and submit a notarized copy of the same to the Company's R&TA. After scrutiny of the documents, the R&TA shall register the Power of Attorney and inform the registration details to the shareholder concerned. Whenever the Power of Attorney holder proposes to enter into a transaction, the registration number mentioned above should be quoted in the correspondence.

**Permanent Account Number (PAN)**

It is mandatory to quote PAN before entering into any transaction in the securities market. Shareholders who have not provided details of their PAN are advised to submit the same immediately to the Company to avoid any inconvenience in future. The Income Tax Department of India has highlighted the importance of PAN on its website: [www.incometaxindia.gov.in](http://www.incometaxindia.gov.in), wherein lot of queries with respect to PAN have been replied to in the FAQ section.

**Insider Trading**

In order to strengthen the legal framework for prohibition of insider trading in securities, SEBI notified the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 including

amendments thereto (Regulations). Under the Regulations promoters, key managerial personnel, directors of a company and designated persons as mentioned under Company's code of internal procedures and conduct for regulating, monitoring and reporting of trading by designated person are required to file initial disclosure whereas continual disclosure is required to be filed by promoters, employees and directors of the company.

Code inter alia prohibits insiders and designated persons from trading in securities while in possession of unpublished price sensitive information in relation to the Company and also during the period when the Trading Window is closed. Company's code of internal procedures and conduct for regulating, monitoring and reporting of trading by designated person is available at <https://www.srghousing.com/Policy-Insider-Trading>.

### **Takeover Regulations**

The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (Takeover Regulations) cast obligation on the investor (acquirer) to make disclosure w.r.t. acquisition/disposal of shares. The relevant provisions are summarised below:

#### **Disclosure of acquisition**

Any acquirer who acquires shares (including convertible securities) or voting rights in a target company which taken together with shares or voting rights, if any, held by him and by persons acting in concert with him in such target company, aggregating 5% or more of the shares of such target company, should disclose their aggregate shareholding and voting rights in such target company, to the target company and stock exchanges within 2 working days of the receipt of intimation of allotment/acquisition of shares or voting rights in the target company, as the case may be.

#### **Disclosure in case of change in holding**

Any person, who together with persons acting in concert with him, holds shares or voting rights entitling them to 5% or more of the shares or voting rights in a target company, should disclose the number of shares or voting rights held and change in shareholding or voting rights, even if such change results in shareholding falling below 5%, if there has been change in such holdings from the last disclosure made; and such change exceeds 2% of total shareholding or voting rights in such target company, to the target company and stock exchanges within 2 working days of such change.

#### **Open Offer**

(1) No acquirer shall acquire shares or voting rights in a target company which taken together with shares or voting rights, if any, held by him and by persons acting in concert with him in such target company, entitle them to exercise 25% or more of the voting rights in such target company unless the acquirer makes a public announcement of an open offer for acquiring shares of such target company in accordance with these regulations.

(2) No acquirer, who together with persons acting in concert with him, has acquired and holds in accordance with these regulations shares or voting rights in a target company entitling them to exercise twenty-five per cent or more of the voting rights in the target company but less than the maximum permissible non-public shareholding, (i.e. 75%) shall acquire within any financial year additional shares or voting rights in such target company entitling them to exercise more than five per cent of the voting rights, unless the acquirer makes a public announcement of an open offer.

#### **E-voting**

The Act, the Companies (Management and Administration) Rules, 2014 and Regulation 44 of the Listing Regulations require a listed company to provide e-voting facility to its shareholders in respect of all shareholders' resolutions to be passed at General Meetings/postal ballots.

### **Register e-mail address**

To contribute towards greener environment and to receive all documents, notices, including Annual Reports and other communications of the Company, investors are requested to register their e-mail addresses with their DP.

### **Intimate mobile number**

Shareholders are requested to intimate their mobile number and changes therein, to their DP, to receive communications on corporate actions and other information of the Company.

### **Shareholders' General Rights**

- To receive not less than 21 clear days' notice of general meetings.
- To receive notice and forms for Postal Ballots in terms of the provisions of the Act and the relevant Rules issued thereunder.
- To receive copies of the financial statements, including consolidated financial statements, if any, report of directors and auditors thereon and every other document required by law to be annexed or attached to the financial statements (Generally known as "Annual Report") not less than 21 days before the date of the Annual General Meeting.
- To participate and vote at General Meetings either personally or through proxy (proxy can vote only in case of a poll).
- To receive Dividends and other corporate benefits like Bonus, Rights, etc. once approved.
- To demand poll on any resolution at a General Meeting in accordance with the provisions of the Act.

### **Duties/Responsibilities of Investors**

- To take informed investment decision(s).
- To be aware of relevant statutory provisions and ensure effective compliance therewith.
- To deal with only SEBI registered intermediaries while dealing in the securities.
- Not to indulge in fraudulent and unfair trading in securities nor to act upon any unpublished price sensitive information.
- To participate effectively in the proceedings of shareholders' meetings.
- To contribute to the Greener Environment and accordingly register email addresses to enable the Company to send all documents/notices including Annual Reports electronically.
- To register nominations, which would help the nominees to get the shares transmitted in their favour without any hassles.

- To participate in the e-voting facility provided by the company or attend the General Meeting of the Company and cast their vote.
- To respond to communications seeking shareholders' approval through Postal Ballot.
- To respond to communications of SEBI/Depository/DP/ Brokers/Sub-brokers/Other Intermediaries.

#### **Monitoring of foreign investment limits in the company**

Foreign Investment in India is regulated in terms of clause (b) of sub-section 3 of section 6 and section 47 of the Foreign Exchange Management Act, 1999 (FEMA) read with Foreign Exchange Management (Transfer or Issue of a Security by a Person resident Outside India) Regulations, 2017 issued vide Notification No. FEMA 20(R)/2017-RB dated November 7, 2017. FEMA prescribes the various foreign investment limits in listed Indian companies. These include the aggregate FPI (Foreign Portfolio Investor) limit, the aggregate NRI (Non-Resident Indian) limit and the sectoral cap. Foreign investors making investment/willing to make investment in securities of the Company are advised to visit websites of BSE ([www.bseindia.com](http://www.bseindia.com)), NSDL ([www.nsdl.co.in](http://www.nsdl.co.in)) and CDSL ([www.cdslindia.com](http://www.cdslindia.com)) beforehand to know more on the foreign investment limits and the headroom available from time to time for investment in securities of the Company.

#### **XIV. Contact Details**

| <b>Contact details</b>  | <b>Address</b>  |
|---|---|
| Ms. Sunaina Nagar<br>Company Secretary  | 321 S.M. Lodha Complex, Near Shastri Circle, Udaipur - 313001<br>Rajasthan, India.<br>+91- 294 – 2561882<br>info@srghousing.com<br>www.srghousing.com     |
| REGISTRAR AND SHARE<br>TRANSFER AGENTS<br>Sharex Dynamic (India) Pvt.<br>Ltd.<br>Mr. Amar Patel | C 101, 247 Park, LBS Marg, Vikhroll West Mumbai 400083 India.<br>Tel. No. 022-28515606; / 022- 28515644<br>support@sharexindia.com<br>www.sharexindia.com |

#### **XV. APPROVED/REVISED**

- The Company Secretary is authorised to amend 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 the Stakeholder Relationship Committee for noting and ratification.
- This Policy shall be effective from January 1, 2020 and can be modified, withdrawn or suspended by the Company at its sole discretion without any prior intimation.

sd/-  
Vinod Kumar Jain  
Managing Director  
DIN: 00248843