

Document Title	Investor Grievance Redressal Policy (IGRP)
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Applicable from	01/04/2021

INVESTOR GRIEVANCE REDRESSAL POLICY

1. Short title, commencement and purpose

(1) This Policy may be called the Investor Grievance Redressal Policy

(2) This Policy shall be applicable from April 01, 2021

(3) The purpose of this policy is:

- a) to provide efficient services to the investors and to effectively address and redress the grievances of the investors in a timely manner;
- b) to timely deliver the share certificates pursuant to transfer, transmission, split etc. to the shareholders;
- c) to effectively remit the dividend on the shares declared by the Company and deliver the annual reports and AGM notices to the shareholders; and
- d) to assist the shareholders to avail such other rights available under law for the time being in force

(5) The Board has appointed the M/s. Alankit Assignment Limited as its Register and Share Transfer Agents (“RTA or STA”) And Company Secretary to ensure faster and efficient provision of services to the investors. The Company Secretary shall 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 e-mail address of the Company for investor grievances.

2. Definitions

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

- (1) “**Board**” means the Board of Directors of Insecticides (India) Limited.
- (2) “**Company**” means Insecticides (India) Limited.
- (3) “**Stipulated turnaround time**” means the timelines as specified in section 3 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.

3. Investor Service Timelines

The Company and its RTA follow the following timelines for performance of its duties toward shareholders:

- (1) Matters such as change of address, non-receipt of annual report and updation of bank details. These matters are addressed by the RTA within a period of 5 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 5 working days from the receipt of such documents to the RTA's satisfaction.

(2) Matters other than those referred in 3(1) above, including but not limited to transfers, change of name, dematerialization, and loss of share certificates, are addressed by the RTA within a period of 7 to 15 days from the receipt of the request. In case, any supporting documents are required by the RTA 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 RTA's satisfaction.

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

4. Classification of Shareholders Communication

The Company receives various correspondence / communication from the investors relating to the shares, annual reports, dividends, revalidations of dividend drafts and ancillary matters. These communications may either be complaints or mere queries / requests by the shareholders. The Company strives to follow the highest corporate governance and transparency hereby defines its investors servicing timelines and

further laydown the process for redressal of complaints and the escalating matrix thereof.

(1) Communications not treated as Complaint

a) **Non-receipt of Annual report** - First request or any such communication for 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. Such communication shall be treated as request for an additional copy of the annual report. Company shall respond to the request by intimating the original date of dispatch of annual report and will also share a copy of the annual report in compliance with the shareholder's request.

b) **Non-receipt of Dividend** - First request or any such communication for 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).

When the Company is unable to pay out the dividend:

(i) 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.

- (ii) In case the dispatched dividend warrant / demand draft is returned undelivered, the Company will proceed with re-dispatching the 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.
- c) **Non-Receipt of Share Certificate-** Non-receipt of duly authenticated share certificate(s) upon sub-division / transfer / transmission / consolidation / re-materialization will be considered as a query if, the Company has dispatched the share certificates within prescribed time limits.
- d) **Shareholder communication through statutory authorities-** Any communication from investors through statutory authorities which is not treated as a complaint by the statutory authority, and which would not have been treated as a complaint by the Company if it was directly addressed to the Company, will not be treated as a complaint.

Explanation: 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.

- e) **Change in details of Shareholders** - 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
- f) **Demand of Information / Documents** - 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.
- g) **Incomplete communications**- communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint.
- h) **Sub-judice matters** - Communications / complaints in relation to matters that are sub-judice will not be treated as a complaint under this Policy.

(2) Communications treated as Complaint

- a) **Non-receipt of Annual report** - Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if, the Company / RTA has not dispatched the annual report to the shareholder on or before the due date(s), or the Company / RTA has not responded to shareholder's request within the stipulated turnaround time.

- b) **Non-receipt of dividend** - Any communication for non-receipt of dividend warrants / demand drafts sent to the Company or to the RTA after the expiry of the stipulated turnaround time for issuance of duplicate dividend warrant will be considered as complaint.

- c) **Non-receipt of share certificates** - Communication for non-receipt of duly authenticated share certificate(s) after the expiry of the statutory period for giving effect to the respective request will be treated as a complaint if, the Company has not dispatched the share certificates to the shareholder.

- d) **General** - Any communication from the investor not responded to by the Company or not responded by the Company within the stipulated turnaround time will be considered as complaint.

5. Investor Grievance Redressal Mechanism

- (1) 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 Nodal Officer appointed by the Company as specified under the Contact Details section of this Policy

- (2) 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. 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.
- (3) In case of non-satisfactory response from RTA, investors can also lodge their complaints through the Company's designated email id for investor grievances - investor@insecticidesindia.com. The designated e-mail id is also displayed on the Company's website. Alternatively, investors can send their complaints at the registered office of the Company.
- (4) If the investor does not receive a reply from the RTA 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.

(5) Only complaints sent through valid e-mail ID's and mentioning of DP/Client ID to the addresses / e-mail id's mentioned in this Policy or the Company's website will be treated as valid complaints.

6. Investor Compliant Contact Details

(1) For matters other the IEPF

(i) RTA – Alankit Assignment Ltd., 205-208, Anarkali Complex, Jhandewalan Extension, New Delhi (Mr. JK Singla/ For Insecticides (India) Limited)

Email : jsingla@alankit.com

(ii) Company – Insecticides (India) Limited, Secretarial Department, 401-402, Lusa Tower, Azadpur Commercial complex, Delhi – 110033

Email : iilsecretarial@insecticidesindia.com; investor@insecticidesindia.com

(2) For IEPF

Mr. Sandeep Kumar, Company Secretary & CCO, Nodal Officer – Insecticides (India) Limited, 401-402, Lusa Tower, Azadpur Commercial complex, Delhi – 110033

Email : cs.sandeep@insecticidesindia.com

7. Revision and Amendments

The Company Secretary is authorized to amend the Policy to give effect to any changes / amendments notified by the Ministry of Corporate Affairs or SEBI. This

policy can be amended with the approval/ ratification of Stakeholder Relationship Committee

List of Approval and Amendments

<i>Approval and Amended By</i>	<i>Meeting date</i>
<i>Stakeholders Relationship Committee and Board of Directors</i>	<i>07/02/2021</i>