



## VAIBHAV GLOBAL LIMITED

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### Investor's Grievance Redressal Mechanism

#### 1. Introduction

The purpose of this mechanism is to formalize the management of grievances from our investor/shareholders to minimize the risks. The grievance process, outlined in this mechanism, provides an avenue for investors to voice their concerns and offers transparency on how grievances will be managed, which aims to reduce conflict and strengthen relationships between investors.

The Company's equity shares are listed on BSE Limited and National Stock Exchange of India Limited. Pursuant to various statutes and by virtue of their shareholding in the Company, shareholders enjoy several rights, which inter-alia include the right to receive (i) share certificates pursuant to transfer, transmission, split etc., (ii) any dividend on the shares declared by the Company, (iii) annual reports and AGM notice, and (iv) such other rights available under law for the time being in force.

The Company has appointed M/s. Kfin Technologies Limited as its Registrar and Share Transfer Agents ("RTA") to ensure faster and efficient provision of services to the shareholders. The RTA is primarily responsible for handling shareholders related affairs of the Company.

The Board has appointed the Company Secretary to act as Compliance Officer of the Company, who will ensure for prompt and effective services to shareholders and monitoring the dedicated email address of the Company for investor/shareholders grievances.

This mechanism is approved by Stakeholders Relationship Committee on 29<sup>th</sup> March, 2023 and shall be applicable from 1<sup>st</sup> April, 2024.

#### 2. Shareholder Service Timelines

The RTA/Company follows the timelines for performance of its duties toward shareholders request / grievances, which has been duly provided at the website of the RTA i.e. <https://ris.kfintech.com/clientservices/isc/default.aspx>

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

#### 3. Classification of Shareholder Communication

The Company / RTA receives various correspondence / communication from the shareholders 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 follows a set of guidelines for classifying the shareholders' communication between general correspondence / requests / complaints, etc. These guidelines are internal to the Company.

#### 4. 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 mechanism for handling of the query / communication will be treated as one complaint/communication.
- b. If a query is resolved and there is no reminder from the shareholder, such query will be treated as resolved.
- 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. The following guidelines shall be applied for treating communication as Request or Complaint:

Sr. No.	Communication treated as request	Communication treated as Complaint
<b>1.</b>	<b>Non-receipt of Annual Report</b>	
	a) First request or any such communication w.r.t. non - receipt of annual report, if the Company has dispatched the annual report to the shareholder on or before the due date(s) through permissible means. b) The request(s) prior to the due date of dispatch of Annual report to all shareholder c) Request of annual report from the person other than shareholder. d) Request for Physical copy of Annual Report.	Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if: <ul style="list-style-type: none"> <li>• the Company / RTA has not dispatched the annual report to the shareholder on or before the due date(s), or</li> <li>• the Company / RTA has not responded to shareholder's request within the stipulated turnaround time.</li> </ul>
<b>2</b>	<b>Non-receipt of dividend</b>	
	a) First request or any such communication w.r.t. 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: b) In case, the dividend credit has been declined by the bank, the Company will pay out the dividend through a dividend warrant / demand draft / banking channel. Communication from the shareholder during the period will be treated as a request. c) 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. d) The request(s) prior to the due date of payment of dividend	a) Any communication w.r.t. 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. b) Any reminder post stipulated turnaround time.
<b>3</b>	<b>Non-receipt of share certificates / transfer / transmission / sub-division etc</b>	
	Non-receipt of duly authenticated share certificate(s) upon sub-division / transfer / transmission / consolidation / re-materialization will be considered as a request if, the Company has	Communication w.r.t. non-receipt of duly authenticated share certificate(s) after the expiry of the statutory period for giving effect to the respective request will be

	<p>dispatched the share certificates within prescribed time limits.</p> <p>The Company shall respond to the query by sharing details of dispatch to the shareholders. It is clarified that upon the dispatch of share certificate through registered post or courier or any other approved mode, the Company shall be deemed to have discharged its duty and the shareholders are expected to coordinate with the postal / courier agency for the share certificates dispatched.</p>	<p>treated as a complaint if, the Company has not dispatched the share certificates to the shareholder.</p>
<b>4.</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, any grievances directly submitted to SEBI through SCORES, without lodging prior to Company, 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>5.</b>	<b>Miscellaneous</b>	
	<ul style="list-style-type: none"> <li>• Correspondence w.r.t. 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.</li> <li>• Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.</li> <li>• 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.</li> <li>• Incomplete communications, communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint.</li> </ul>	<p>Any communication from the shareholder not responded to by the Company or not responded by the Company within the stipulated turnaround time will be considered as complaint.</p>

	<ul style="list-style-type: none"> <li>• Communications / complaints in relation to matters that are subjudice will not be treated as a complaint.</li> </ul>
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#### 5. Investor Grievance Redressal Mechanism

- a. Shareholders 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, Shareholders can directly contact the Nodal Officer appointed by the Company as specified under the Contact Details section of this mechanism.
- b. Any information, other than those specified above, or any supporting documentation required for redressal of the complaint shall be informed to the shareholders by the RTA. Shareholders 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-receipt of reply within stipulated turnaround time or non-satisfactory response from RTA, Shareholders can also lodge their complaints or accelerate at the Company's designated email id for investor grievances i.e. [investor\\_relations@vaibhavglobal.com](mailto:investor_relations@vaibhavglobal.com). The designated email id is also displayed on the Company's website. Alternatively, investors can send their complaints/request at the registered office of the Company.
- d. Additionally, shareholders are urged to refrain from sending multiple reminders during the above-mentioned turnaround periods for redressal of their complaints.
- e. Shareholders are requested to approach the RTA, or in case of any non-action by the RTA, to the Company, for redressal of their concerns prior to raising their concerns with the regulatory authorities.
- f. Only complaints sent on the addresses / email ids mentioned in this mechanism will be treated as valid complaints.
- g. The Company periodically obtains status report of the complaints from the RTA.
- h. As required under Regulation 13 of Listing Regulations, the Company files with the Stock Exchanges and places the statement of shareholders complaints at the Board meeting on a quarterly basis. Further, the Company also makes annual disclosure of the statement of shareholders complaints in its annual report pursuant to the Listing Regulations.
- i. The Investor, other than shareholder of the Company, can raise their query/ request at the below given details.

<b>CONTACT DETAILS</b>		
<b>Sr. No.</b>	<b>Nature of Request / Complaint</b>	<b>Communication address</b>
<b>1</b>	Share/ share certificates / transfer / transmission / sub-division/dividend/other correspondences/query/request by Shareholder in relation to securities	<b>KFin Technologies Limited</b> Address: Selenium Tower B, Plot 31-32, Gachibowli, Financial District, Nanakramguda, Hyderabad – 500 032 Email: <a href="mailto:einward.ris@kfintech.com">einward.ris@kfintech.com</a> Tel No.: 1800 309 4001, Whatsapp No. (91) 910 009 4099
<b>2.</b>	Escalation to Company (Level -1)	<b>Assistant Company Secretary</b> Address: E-69, EPIP, Sitapura, Jaipur - 302033 Tel. No. : 0141-2770648 Email: <a href="mailto:investor_relations@vaibhavglobal.com">investor_relations@vaibhavglobal.com</a> Tel. No. : 0141-2770648, Ext: 118

3.	Escalation to Company (Level -2)	<b>Company Secretary</b> Address: E-69, EPIP, Sitapura, Jaipur - 302033 Email: <a href="mailto:sushil.sharma@vlggroup.com">sushil.sharma@vlggroup.com</a> Tel. No. : 0141-2770648, Ext: 222
4.	IEPF related matters	<b>Mr. Sushil Sharma, (Nodal Officer)</b> <b>Company Secretary</b> Address: E-69, EPIP, Sitapura, Jaipur - 302033 Email: <a href="mailto:csvgl@vaibhavglobal.com">csvgl@vaibhavglobal.com</a> <a href="mailto:sushil.sharma@vlggroup.com">sushil.sharma@vlggroup.com</a> Tel. No. : 0141-2770648, Ext: 222
5.	Investor's Requests/queries (other than shareholder)	<b>Head-Investor Relations</b> Address: E-69, EPIP, Sitapura, Jaipur - 302033 Email: <a href="mailto:prashant.saraswat@vlggroup.com">prashant.saraswat@vlggroup.com</a> Tel: +91-141-2770648, Ext: 140

#### 6. Limitation and Amendment

In the event of any conflict between the provisions of this mechanism and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this. Any subsequent amendment / modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this mechanism.

#### 7. Review of the mechanism:

The Stakeholders Relationship Committee will review this mechanism from time to time to ensure its effectiveness. The Company Secretary is authorised to amend the mechanism from time to time to give effect to any statutory changes / amendments or for the better & smooth services or good governance.

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