



Globe Civil Projects Limited

Investor Grievance Redressal Policy

I. Title:

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

II. Background:

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 Kfin Technologies Limited (RTA/Kfin) to discharge investor service functions on behalf of the Company. It is entrusted with handling all share related matters including transmission, transposition, nomination, dividend, change of name / address / signature, registration of mandate / Power of Attorney, replacement / split / consolidation of share certificate / demat / remat of shares, issue of duplicate certificates, etc. The Company closely monitors the functions of the RTA and seeks confirmation in that regard from time to time.

III. Objective:

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 thereby building friendly investor relations. It also enables the Company use investors' views as a feedback mechanism.

The Policy aims to:

- Disseminate the Company's existing mechanism for receiving and addressing grievances of investors;
- Resolve complaints fairly and expeditiously;
- Ensure confidentiality of complainant's information unless required for addressing the complaint;
- Ensure clear accountability for resolution and reporting of complaints;
- Continually improve its processes & systems by taking inputs/ feedback from the investors.

IV. Grievance Handling Mechanism:

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.

Kfin being the RTA of the Company is primarily responsible for discharging investor service functions effectively, efficiently and expeditiously.

Investors can lodge a complaint or grievances for securities related matters by giving details of their name, folio no., DP ID/ Client ID, nature and full particulars of their complaint/ grievances along with duly executed supporting documents to the Company/ RTA. The contact details of Investor Relations Department, investor e-mail ID and RTA shall be mentioned on every communication of the Company to the shareholders and on the website of the Company.

The Company also has a designated email ID compliance@globecivilprojects.in for handling investor grievances.

Secretarial Department of the Company accesses the above-mentioned designated investor grievances e-mail ID on a daily basis to ensure timely responses to be given to the investors.

All the investor complaints/ grievances received through “SEBI Complaints Redress System” (SCORES Portal) are being attended and resolved expeditiously.

The status of receipt, redressal and pendency of all the complaints are placed before the Stakeholders Relationship Committee of the Company.

As per the provisions of the Companies Act, 2013, shares / dividends are transferred to Investor Education and Protection Fund (IEPF) after sending reminder letters to concerned shareholders and public notice in newspapers.

The Company has provided an on-line feedback facility to shareholders to give feedback about various investor services offered by the Company.

The Company has made available escalation matrix for shareholders to escalate their concern, the details of which are given at point.

V. Process followed for Investor Service Requests:

Timelines: The Company and its RTA follow the timelines as stipulated under law for performance of its duties towards investors.

Investor emails will be responded within two working days. If the matter requires consideration / verification of records / validation of information, the Company will give an interim response within two working days and endeavor to provide information within 10 working days.

Prescribed Forms: Investor shall submit their service request in the requisite forms, as applicable and as prescribed by the regulatory authority(ies). The requisite forms are available on the Company’s website, under the Investor section. Investors shall duly fill the prescribed forms and forward their service request, along with the requisite self-attested and dated or e-signed documents as prescribed under each form to the RTA.

Plain paper requests: If no specific form has been prescribed, the request may be made on a plain paper / from registered email to the RTA.

Mandatory details to be provided in request: In all communications, investor should provide their complete shareholding details viz. folio no /DP ID, Client ID, contact number/ mobile number and email address.

Request on designated email id/address: Only those requests that are sent on the addresses / Email IDs mentioned in the Policy (under Contact details section), shall be treated as valid service request(s) under the Policy.

For investor holding shares in dematerialized form: All service requests pertaining to updation of KYC, nomination, bank accounts details, contact details etc. are required to be submitted to their respective depository participant.

FAQs: The Company has also formulated a set of frequently asked questions (FAQs) in respect of share related matters for better shareholder awareness. Investors can refer the same at on the website of the Company.

Online IEPF Portal: Real Time data of names of the Members and the details of their unclaimed dividend and equity shares to be transferred to the IEPF Authority are uploaded on website where Members can log in to appropriately claim the same.

VI. Classification of Shareholder Communication:

In terms of the policy adopted by the Company grievances/ complaints received from SEBI / Stock Exchanges / Depositories / ROC and RTA relating to the security holders shall be considered for the purpose of reporting to stock exchanges in accordance with SEBI Listing Regulations.

The Company receives various correspondence/ communication from the shareholders/ 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.

(A) Communication from investors to be treated as requests:

- correspondence w.r.t. change in address, nominees etc.
- any communication/ suggestions/ enquiry about procedures
- any communication requisitioning information or documents relating to the Company or its operations as per statutory rights available to the shareholders
- communications in relation to matters that are sub-judice

(B) Communication from investors to be treated as complaints:

All the complaints received through statutory authorities like SEBI, MCA/ROC, Stock Exchanges and the following communication received directly by the RTA shall be considered as complaints for reporting purpose:

- Non Receipt of Annual Report
- Non Receipt of Dividend
- Non Receipt of Demat Credit
- Non Receipt of Exchange Certificate
- Non Receipt of Duplicate Certificate
- Non Receipt of Securities after Transfer / Transmission / Name Deletion / Change of Name