



SREI INFRASTRUCTURE FINANCE LIMITED

Regd. Office: “Vishwakarma”
86C, Topsia Road (South), Kolkata - 700 046
Website: www.srei.com, Email: investor.relations@srei.com

INVESTOR GRIEVANCE REDRESSAL POLICY **(For Equity Shareholders)**

➤ COMPANY - AT A GLANCE

- The Company’s Equity Shares are listed on BSE Limited (BSE) and National Stock Exchange of India Limited (NSE). The Company’s Equity Shares are frequently traded on NSE and BSE.
- The Company’s Equity Shares are under compulsory trading in demat form only.
- Karvy Fintech Private Limited (Karvy), having its office at Karvy Selenium Tower B, Plot 31-32, Gachibowli, Financial District, Nanakramguda, Hyderabad – 500 032, is the Registrar and Share Transfer Agent (RTA) of Company w.e.f. 1st April, 2015.

➤ INVESTOR SERVICE AND GRIEVANCE HANDLING MECHANISM

Investor servicing is one of the key ingredient of good Corporate Governance practices. Recognizing this element, investor servicing becomes an inevitable practice to enhance stakeholders’ confidence.

The Company has an established mechanism for investor service and grievance handling, with RTA and Depositories. The Company Secretary of the Company is the Compliance Officer designated under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “SEBI Listing Regulations”), being the important functional node to liaise with the RTA and Depositories.

All investor service matters are being handled by Karvy, a reputed service provider in India, which discharges Investor Service functions satisfactorily through Investor Service Centres across the Country.

The Company has prescribed turnaround time to respond to various Investor related activities. These turnaround times are being reviewed periodically by the Company and have been specified in Shareholder Referencer, a handbook for shareholders readily available on the website of the Company www.srei.com under the head ‘Investor Zone’. It serves as an easy guide for the investor’s share and dividend related queries and inter-alia covers the shareholders’ grievance redressal mechanism and their duties & responsibilities.

Some of the key steps undertaken by the Company for handling Investor Grievances are enumerated as follows:

1. The Company has a designated email id investor.relations@srei.com for handling investor grievances on a day to day basis on which investor can make a complaint. This email id is mentioned on every public communication being made by the Company with the shareholders and also put on the website of the Company.

2. An Investor can make a written complaint through letter or fax also.
3. Designated person in the Corporate Secretarial Department checks the designated investor grievances email id on a daily basis to check whether any new complaint has been lodged or not.
4. The full details of the complaint are thereafter informed to the Compliance Officer and RTA of the Company as soon as it is received. Any complaint regarding dematerialization of securities etc. are handled by the Depositories and the Compliance Officer shall be informed about these complaints in order to seek resolution for the same.
5. Corporate Secretarial Department obtains all information available on the complaint which is considered necessary for a proper investigation. It looks into all the necessary information and undertakes to resolve them as soon as possible. Personal calls and proactive follow-ups are made to resolve grievance of the investors to enhance shareholders' confidence.
6. Once all the necessary information is received, the investor complaint is generally resolved within 7 (seven) days of receipt of complete documents w.r.t. the same.
7. The status of the resolution is placed by the Compliance officer before the Stakeholders Relationship Committee on a periodic basis and where no resolution has been made, advise of the Committee shall be sought.
8. The investor complaints are also processed in a centralised web-based complaints redress system called SEBI Complaints Redress System (SCORES). The designated person in the Corporate Secretarial Department generally checks SCORES on a daily basis.
9. In case of receipt of complaint on SCORES, proactive approach is taken to obtain necessary information and documents so as to resolve the same with statutory timelines with the help of RTA.
10. Proactive approach is taken to ensure that Action Taken Report is filed on SCORES within 7 (seven) days from the date of receipt of complaint as against the statutory timeline of 30 (thirty) days.
11. The Compliance Officer of the Company reviews the investor complaints status on a regular basis to ascertain whether complaint received has been resolved within time or not.
12. Any complaint (where the personal calls & written responses does not settle the issue) is referred to the Stakeholders' Relationship Committee of the Company.
13. The Company follows the practice of obtaining monthly Status Report of investor complaint pending against the Company from Stock Exchanges as well as SEBI and same are placed in the ensuing Stakeholders Relationship Committee meeting and Board Meeting of the Company.
14. A Status Report on monthly basis is obtained from the RTA of the Company in respect of various correspondences and complaints received by them against the Company and status of redressal of the same is placed before the Stakeholders Relationship Committee

of the Company.

15. Pursuant to Regulation 13(3) read with Regulation 13(4) of SEBI Listing Regulations, Statements of investor complaints as received from the RTA, are filed with BSE & NSE on a quarterly basis and the said Statements are also placed before the Stakeholders Relationship Committee and Board of Directors for information and noting.
16. The Company engages a Practising Company Secretary for undertaking Reconciliation of Share Capital Audit on quarterly basis and also takes a Compliance Certificate certifying that all certificates have been issued within 30 (thirty) days of the date of lodgement for transfer, sub-division, consolidation, renewal, exchange or endorsement of calls/allotment monies in accordance with Regulation 40(9) of SEBI Listing Regulations and Depositories Act, 1996.

The Company focuses to build Investor Relations on pillars of trust and transparency. The Corporate Secretarial Department of the Company effectively deploys tools like Annual Reports, Quarterly Earnings, Investor Releases, Conference calls, one on one Investor meets, General Meetings and Internet (Company website) to serve as a link to stay connected with the Investors. Further, weekly emails are sent to new shareholders intimating corporate profile, annual reports and investor presentation and quarterly emails are sent to all shareholders intimating financial results of the Company.

It is the constant endeavour of the Company to improve the standard of its Investor services. In pursuit of excellence in Corporate Governance and to constantly improve standards of service, communication and disclosures, the Company conducts a preliminary survey on a yearly basis to assess the requirement and satisfaction of valuable Investors on broad parameters such as timely receipt of Annual Reports, Dividend and other documents/correspondence, Quality and contents of Annual Report, Response time and satisfaction level experienced in transfer/transmission of shares, sub-division of shares, issue of duplicate share certificates, change of address, revalidation of dividend warrants, exchange with new share certificates etc.

Karvy Fintech Private Limited (Karvy), Registrar and Transfer Agents (RTA) of the Company is responsible for discharging investor service functions effectively, efficiently and expeditiously. They are responsible for adhering to the SEBI Guidelines raising Industry Standards for RTA and Depositories. The Company has prescribed service standards for various investor related activities being handled by Karvy and process followed by them for handling Investor Grievances is enumerated as follows:

1. At the receiving counter at Karvy stamp is affixed on every letter.
2. Mail is entered in system through an in-house developed programme by Karvy.
3. Karvy replies to mails referring to files, master data & other relevant information within seven days of the receipt of mails.
4. Status of reply given to investor's letters is updated in the mail entry system on fortnightly basis.
5. List of pending mail (if any) is taken up by Karvy with the Compliance Officer and after discussions/verification of records, suitable reply is drafted and issued to the investor.
6. Monthly report on receipt and redressal of investor complaints or grievances is

provided to the Company.

7. In case of Notice/Summons received from a statutory authority such as Court, Income-tax Department, status of the case as available in Karvy's record together with draft reply is provided to Company for vetting and finalisation at their end.
8. Status of redressal of complaints from BSE and NSE is informed to them through Letters/email and if any telephonic enquiry is received from them full details of the case and status of redressal are provided over phone.
9. List of pending complaints is received from SEBI, Kolkata from time to time and action taken for redressal is informed to them in writing in their format. Karvy's representative also visits SEBI for interaction relating to redressal of complaints forwarded by them.
10. Karvy also sends reminder letters from time to time to the shareholders of the Company requesting them to claim their unclaimed dividends etc.

➤ **CONTACT DETAILS FOR INVESTOR GRIEVANCE AND CORRESPONDENCE**

All investor queries and requests can be addressed as per the following details:

Registrar and Share Transfer Agents

Karvy Fintech Private Limited (Karvy)
Unit: Srei Infrastructure Finance Limited
Karvy Selenium Tower B
Plot 31-32, Gachibowli
Financial District, Nanakramguda
Hyderabad - 500 032
Tele: 040 – 67162222 Fax: 040 – 23420814 Toll Free: 1800-345-4001
Email: einward.ris@karvy.com
Website: www.karvyfintech.com

Compliance Officer

Mr. Sandeep Lakhotia
Company Secretary
FCS 7671
'Vishwakarma', 86C, Topsia Road (South)
Kolkata – 700 046
Tel: 91-33-6160 7734
Fax: 91-33-2285 7542/8501
Email: investor.relations@srei.com
Website: www.srei.com

Place: Kolkata

Date: 04.02.2019

This Policy have been reviewed by the Stakeholders Relationship Committee at its meeting held on 25.01.2019 and approved by the Board at its meetings held on 04.02.2019 and will become effective on and after 04.02.2019.