



# Marksans Pharma Ltd.

## Regd. Office

11<sup>th</sup> Floor, Grandeur, Veera Desai Extension Road, Oshiwara, Andheri (W), Mumbai – 400053

## SHAREHOLDERS GRIEVANCE REDRESSAL POLICY

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## **SHAREHOLDERS GRIEVANCE REDRESSAL POLICY**

### **1. Background & Objective**

The equity shares of Marksans Pharma Limited (“the Company / Marksans”) are listed and traded on BSE Limited and the National Stock Exchange of India Limited.

Pursuant to the provisions of various statutes, shareholders of the Company enjoy several rights, which inter-alia include (i) dematerialization of their security certificates (ii) transmission, transposition of shares, (iii) receiving dividends and other entitlements declared by the Company, (iv) receiving annual reports, general meeting notice and such other prescribed communications, (v) any and all rights available to shareholders generally, under applicable laws.

To provide efficient services to the shareholders and to effectively address and redress their grievances in a timely manner, the Company has adopted this Shareholders Grievance Redressal Policy (“the Policy”).

### **2. Shareholder Servicing Mechanism**

We have outlined a framework to ensure a smooth and transparent procedure for interacting with our shareholders. Our values exude in all our interaction and are enshrined by the principles of corporate governance at Marksans.

#### **2.1 As a part of this framework, key initiatives adopted for efficient shareholder servicing are as follows:**

- (i) 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”) and as Nodal Officer of the Company under the Investors Education and Protection Fund rules (“IEPF rules”). As a Compliance Officer, the Company Secretary is responsible for ensuring compliance of all relevant provisions under Companies Act, 2013 (“the Act”), Listing Regulations, applicable law(s) and for effective services to shareholders, besides monitoring the dedicated email address of the Company for shareholder grievances.
- (ii) The Company has appointed M/s Bigshare Services Private Limited as its Registrar and Share Transfer Agent (“RTA”), to ensure faster and efficient services to its shareholders. The RTA is responsible for handling all shareholders related affairs of the Company.
- (iii) The Company has constituted Stakeholders Relationship Committee (“SRC”) which functions under the Chairmanship of an Independent Director, to review redressal of shareholders’ complaints and functioning of the RTA. The SRC meets as often as required to inter-alia review the process of shareholder grievances, including complaints related to transmission of shares, non-receipt of annual report, non-receipt of declared dividends and issue of new/duplicate certificates etc.

- (iv) The SRC also reviews measures taken by the Company for effective exercise of voting rights by shareholders. In addition to the above, SRC reviews adherence to the service standards, adopted by the Company in respect of services being rendered by the RTA, reviews various measures and initiatives taken by the Company towards reducing the quantum of unclaimed dividends and preventing transfer of unclaimed dividend/shares to the IEPF Authority, and also monitors timely receipt of dividend warrants/annual reports/statutory notices by shareholders of the Company.
- (v) The Board of Directors of the Company has authorized Mr. Mark Saldanha, Managing Director, Mr. Jitendra Sharma, Chief Financial Officer and Mr. Harshavardhan Panigrahi, Company Secretary of the Company to consider and approve transmission/transposition/deletion of name of deceased shareholder in case of joint holding of shares held in physical mode, dematerialization/rematerialisation of shares, issue of duplicate of share certificate on surrender of defaced/damaged/mutilated share certificates and issue of duplicate of share certificate in lieu of lost/misplaced share certificate based on proper documentation.

**2.2 For processing of various service requests, shareholders should follow below stated procedure:**

- (i) **Timelines:** Company has laid down stipulated turnaround timelines (“STT”), for processing various requests and redressing grievances of shareholders. The same is enclosed as **Annexure A**. The STT shall be counted from the date of receipt of the complete set of information / documents from a shareholder. In the event of a discrepancy(ies), the RTA shall send communication of such discrepancy(ies), within the aforesaid timelines.
- (ii) **Prescribed Forms:** Shareholder 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. Shareholders shall duly fill in 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.
- (iii) **Plain paper requests:** If no specific form has been prescribed, the request may be made on a plain paper or by e-mail to the Company/RTA from the shareholders’ registered e-mail Id.
- (iv) **Mandatory details to be provided in request:** In all communications, shareholder should provide their complete shareholding details viz. folio no /DP ID, Client ID, contact number / mobile number and email address. If the shareholder does not provide the requisite mandatory information to enable the Company/RTA to address the requisition, the shareholder communication shall be treated as incomplete requisition and shall be liable to be rejected/discarded.
- (v) **Request on designated email id/address:** Only those requests that are sent to the addresses / Email IDs mentioned in the Policy (under Contact details section), shall be treated as valid service request(s) under the Policy.
- (vi) **For shareholders 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. However, wherever permissible, the Company may take their email ID and mobile number on record for future correspondence / communication, with such shareholders.

(vii) For all the matters, shareholders should send all their requests directly to RTA.

### **2.3 Escalation matrix and process safeguards:**

- (i) If a shareholder does not receive reply / satisfactory response within the STT stipulated in the Policy from RTA, shareholder may escalate the matter to the Compliance Officer, by email or postal letter specified under the Contact Details section of the Policy.
- (ii) While dealing with the shareholders service requests / complaints, RTA and Company shall abide by the statutory provisions, processes and guidelines, prescribed under applicable laws i.e. the Act, the Securities and Exchange Board of India Act, 1992 (“the SEBI Act”), the rules and regulations made thereunder and the circulars and notifications issued thereunder.
- (iii) The Company is committed to ensuring data privacy of shareholders. Unless contractually obligated or statutorily required, Company will not share private data of any shareholder with any third party, without the prior approval of the respective shareholder.

### **3. Classification of Communication with Shareholders**

Subject to clause 2.2, shareholder communications shall be classified into ‘Service Request / General Communication’ and ‘Shareholder Complaints’, as per the following principles:

#### **3.1 Service Requests /General Communication**

Communication from shareholders shall be classified as ‘Service Requests /General Communication’, if it satisfies the following parameters:

- (i) Communication of a general nature like queries/seeking information etc from a shareholder received through statutory authorities viz. stock exchanges, Registrar of Companies, Regional Directors, SEBI, etc. which:
  - is not treated as a complaint by the statutory authority(ies); or
  - 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.
- (ii) Communication from a shareholder pertaining to processes specified under ‘Shareholder Servicing Timeline’ shall be considered as a request, if the RTA / Company has adhered to the timeline(s) for completing the process or has responded to the shareholder on or before the due date, with the requisition for necessary information / document(s) as may be required to process the request.
- (iii) A shareholder communication requisitioning information or documents relating to the Company or its operations, in accordance with statutory rights available to the shareholders, shall be treated as a request (and not a complaint) if the requisition is in proper format and the Company has responded to the same within prescribed time limits.
- (iv) Any communication / suggestions / enquiry about procedures for any action by the RTA/Company, shall be considered as a service request / general enquiry and not a complaint. Incomplete communications, communications without requisite supporting documentation, or any communication which is vague or non-specific in nature, shall not be treated as a complaint.
- (v) Communications in relation to matters that are sub-judice, shall not be treated as a complaint under the Policy.

### 3.2 Shareholder Complaints

Communications from shareholders, shall be treated as complaints in the following situations:

- (i) Any communication from a shareholder received through statutory authorities viz. stock exchanges, Registrar of Companies, Regional Directors and SEBI, etc. which is treated as complaint by such statutory authority(ies), shall be treated as a complaint by the Company.
- (ii) Any communication from a shareholder which is not responded to, within the STT or the extended timelines by the regulatory authorities, shall be considered as a complaint.

### 3.3 Other general principles guiding classification of shareholder communication

- (i) In case multiple correspondence / communications / reminders are received for the same matter and query is not resolved within the STT, it shall be treated as one complaint.
- (ii) If a shareholder approaches multiple statutory authorities with same / similar query during a quarter, the same shall be treated as separate complaints from such shareholder, for the purpose of regulatory filings during the quarter.

In case of any ambiguity, the Compliance Officer shall be the sole authority to decide on the nature and classification of communication, and the decision of the Compliance Officer in this regard, shall be final and binding.

## 4. Contact Details

Purpose	Contact details	Address
For any kind of matter related to shares and dividend	Bigshare Services Pvt. Ltd.  (Registrar and Transfer Agent (RTA) of Marksans Pharma Limited)	Office No S6-2, 6 <sup>th</sup> Floor, Pinnacle Business Park, Next to Ahura Centre, Mahakali Caves Road, Andheri (East), Mumbai – 400093  Ph. No. 022-62638200 Fax No. 022-62638299 E-mail: <a href="mailto:investor@bigshareonline.com">investor@bigshareonline.com</a> Website: <a href="http://www.bigshareonline.com">www.bigshareonline.com</a>  The Company's RTA has launched Gen-Next Investor Interface Module "iBoss" the most advanced tool to interact with investors. Shareholders are requested to login into "iBoss" and help them to serve shareholders better. The Company's RTA has also implemented a user-friendly online portal for processing investor service requests and complaints, which is now available on their website under the heading <b>iConnect</b> <a href="https://iconnect.bigshareonline.com/Account/Login">https://iconnect.bigshareonline.com/Account/Login</a>  For the shareholders, they also have a

		dedicated grievance link through which shareholders can directly raise a query: <a href="https://www.bigshareonline.com/InvestorLogin.aspx">https://www.bigshareonline.com/InvestorLogin.aspx</a>
Escalation Matrix	Company Secretary and Compliance Officer, Marksans Pharma Limited.	Marksans Pharma Limited 11 <sup>th</sup> Floor, Grandeur, Veera Desai Extension Road, Oshiwara, Andheri (West), Mumbai – 400 053  Ph: (022) 4001 2000  Email: <a href="mailto:companysecretary@marksanspharma.com">companysecretary@marksanspharma.com</a>  Website: <a href="http://www.marksanspharma.com">www.marksanspharma.com</a>

The shareholders who have not registered their e-mail addresses are requested to register them with the Company to receive e-communication from the Company. For registering e-mail address, the shareholders are requested to follow the below steps:

- i. Shareholders holding shares in physical mode are requested to provide name, folio number, mobile number, e-mail address, scanned copies of self-attested share certificate(s) (both sides) through e-mail on [companysecretary@marksanspharma.com](mailto:companysecretary@marksanspharma.com) or alternatively, do the same through the Registrar and Transfer Agent's website link at: <https://www.bigshareonline.com/InvestorRegistration.aspx>.
- ii. Shareholders holding shares in dematerialised mode are requested to register their email addresses and mobile numbers with their relevant depositories through their depository participants.

## 5. Miscellaneous

- (i) The Policy shall be disclosed on the website of the Company.
- (ii) Any words / terms used in the Policy but not defined herein, shall have the meaning ascribed to such term in the Articles of Association of the Company, the Act and the rules made thereunder, the SEBI Act read with the rules and regulations made thereunder, and any other relevant legislation / law applicable to the Company.
- (iii) In the event of a conflict between the terms of the Policy and any rule, regulation or standard, the provisions of such rule, regulation or standard shall prevail over this Policy, to the extent of such inconsistency.
- (iv) In the event of a dispute or difference in opinion on the meaning/interpretation of any provision in the Policy, the matter shall be referred to the Compliance Officer, and the decision of the Compliance Officer shall be final and binding, in this regard. In interpreting any term / provision of the Policy, the Compliance Officer may, in his discretion, seek the help of the management of the Company or an outside expert, as he deems fit.
- (v) The Compliance Officer is authorised to amend the Policy, to give effect to any changes / amendments notified by the Ministry of Corporate Affairs or the Securities and Exchange Board of India. The amended Policy shall be placed for noting and ratification of the SRC at its subsequent meeting.

- (vi) The SRC reserves the right to review this Policy from time to time and amend this Policy to reflect legal and regulatory changes and further strengthen shareholders servicing practices.

**This Policy has been approved by the Stakeholders Relationship Committee of the Board of the Company in its meeting held on 13<sup>th</sup> February, 2023 (“Effective date”).**

## Annexure A

The Company and RTA shall follow below mentioned timelines for the specified requests /process:

Nature of request / process	Stipulated Turnaround Time
Request for copy of the Annual Report	15 days
Processing Demat and Transposition request	
Change in / up-dation of contact details (address, e-mail, and mobile number), bank account details and PAN	
Re-validation of dividend warrants and sending the remittance request files to the bank	
E-mail intimation regarding distribution of corporate benefits (dividend, bonus, stock split)	
Processing Transmission request	21 days
Processing Remat request	30 days
Issuing “Letter of Confirmation” in lieu of physical security certificate for below service requests: <ul style="list-style-type: none"> <li>(a) Issuing duplicate security certificates;</li> <li>(b) Claim from Unclaimed Suspense Account;</li> <li>(c) Renewal / exchange of securities certificate;</li> <li>(d) Endorsement;</li> <li>(e) Sub-division / Splitting of securities certificate;</li> <li>(f) Consolidation of securities certificates/folios;</li> <li>(g) Transmission; and</li> <li>(h) Transposition.</li> </ul>	
Intimation through letters regarding distribution of corporate benefits (dividend, bonus, stock Split)	
Change in / up-dation of name, signature and nomination	
Response to inquiries and communication, other than the categories listed above	