# INVESTOR GRIEVANCE REDRESSAL POLICY

**OF** 

# **GUJARAT AMBUJA EXPORTS LIMITED**

#### 1. BACKGROUND:

Equity Shares of the Gujarat Ambuja Exports Limited (the "Company") are listed on the recognized stock exchanges viz., National Stock Exchange of India Limited ("NSE") and BSE Limited ("BSE").

The matters related to transfer/ transmission / transposition and exchange of securities, etc. of the Company and activities related to handling of Shareholders / Investors grievance and related functions of the Company are performed by Jupiter Corporate Services Limited, Registrar & Share Transfer Agent of the Company ("RTA") which is closely monitored by the Company and confirmation in that regard is being obtained from RTA from time to time.

The Board of Directors of the Company at its meeting held on 31<sup>st</sup> March, 2025 has approved the Investor Grievance Redressal Policy of the Company.

## 2. OBJECTIVE:

This Policy is formulated to provide prompt services to the investors and to effectively address and redress their grievances in a timely manner. It also helps build investor confidence by formulating investor grievance redressal mechanism and to develop friendly relations with the investors.

The Company should:

- a. Ensure visibility and accessibility of complaint handling process to all complainants.
- b. Handle complaints professionally & in a transparent manner
- c. Ensure confidentiality of complainants information unless required for addressing the complaint
- d. Ensure clear accountability for resolution and reporting of complaints

The Company should also classify & differentiate queries, requests and complaints, etc. and accordingly resolve them to the satisfaction of the concerned investors.

#### 3. **DEFINITIONS:**

**"Director"** means a member of the Board of Directors of Gujarat Ambuja Exports Limited.

**"Company"** means Gujarat Ambuja Exports Limited and whenever the context requires, shall signify the Company acting through its Board.

"Policy" means this Policy on "Investor Grievance Redressal Policy".

**"SCORES"** is a web based centralized grievance redressal system of SEBI (https://scores.sebi.gov.in/), which enables the investors to lodge and track anywhere the status of redressal of such complaints online from the above website.

**"Online Dispute Resolution Portal"** / "**ODR Portal"** is a platform designed to enhance investor grievance redressal by enabling investors to access Online Dispute Resolution Institutions for the resolution of their complaints.

#### 4. GRIEVANCE HANDLING MECHANISM:

The Board has appointed the Company Secretary to act as Compliance Officer of the Company under the Securities and Exchange Board of India (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 investors / shareholders and monitoring the dedicated email address of the Company for investor grievances.

RTA of the Company i.e. M/s. Jupiter Corporate Services Limited is primarily responsible for discharging investor service functions effectively, efficiently and expeditiously. The designated email ID <a href="mailto:investor-jcsl@ambujagroup.com">investor-jcsl@ambujagroup.com</a> of RTA is also made available to the shareholders / investors for grievance redressal.

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, address and email ID of 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 <u>cs@ambujagroup.com</u> 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.

If an investor request remains unresolved within the timelines as stipulated under law, then the matter can be escalated to the designated officials of the Company, as mentioned in escalation matrix below.

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.

Reports from time to time are being obtained by the Company from the RTA in respect of correspondences & grievances, and the same is placed before the Stakeholders Relationship Committee of the Board of Directors of the Company from time to time.

The Stakeholders Relationship Committee reviews the effectiveness of the grievance redressal mechanism in place for handling complaints from investors.

The statement of investor complaints, on a quarterly basis, is also placed before the Board of Directors of the Company.

The Company also makes annual disclosure of the statement of investor complaints in its annual report pursuant to the requirements of the Listing Regulations.

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

#### 5. CLASSIFICATION OF SHAREHOLDER COMMUNICATION:

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:

- a. Non Receipt of Share Certificate
- b. Non-receipt of annual report
- c. Non-receipt of dividend
- d. Non-receipt of Split Share Certificates
- e. Duplicate Repayment Warrant
- f. Transmission / Name Deletion
- g. Amalgamation GACL/GAPL & JBL
- h. Issue of Duplicate Shares
- i. Scheme of Arrangement of Capital Repayment
- j. Intimation for sub-division of Equity Shares
- k. correspondence w.r.t. change in Name, Status, Address, Signature, Nominees etc.
- 1. any communication/suggestions/enquiry about procedures
- m. any communication requisitioning information or documents relating to the Company or its operations as per statutory rights available to the shareholders
- n. communications/ complaints in relation to matters that are subjudice

# B. Communication from investors to be treated as complaints:

Investor communication received through statutory authorities.

Thus, only the complaints received from regulatory bodies like Securities and Exchange Board of India, Ministry of Corporate Affairs, Stock Exchanges etc. shall be considered as complaints for reporting purpose.

#### 6. ESCALATION MATRIX FOR INVESTORS' GRIEVANCES

### A. Registrar and Share Transfer Agent:

Investors are requested to route their service requests/grievances first to the Company's RTA.

Following are the contact details of RTA:

# **Jupiter Corporate Services Limited**

"Ambuja Tower", Opp. Sindhu Bhavan, Sindhu Bhavan Road,

Bodakdev, P.O. Thaltej, Ahmedabad - 380 059

Phone : +91-79-61556677 Fax : +91-79-61556678

Email ID: Investor-jcsl@ambujagroup.com

# B. Escalation Level 1 (Company):

Wherein the grievance(s) of the investors are not resolved within 7 working days of sending the email to RTA/the Company or within required timelines after delivery of all the requisite documents and information or wherein the investor is not satisfied with the resolution provided, he/she/they can refer the grievance(s) to the following executives of the Company at:

#### Mr. Girish Solanki

(Senior Executive)

Secretarial Department (Share Department)

Ambuja Tower", Opp. Sindhu Bhavan, Sindhu Bhavan Road,

Bodakdev, P.O. Thaltej, Ahmedabad - 380 054

Phone : +91-79-61556677 Fax : +91-79-61556678

Email ID: girishsolanki@ambujagroup.com

# C. Escalation Level 2 (Company):

Wherein the grievance(s) of the investor is not resolved within the next 5 working days of sending the email to the above executives of the Company or where the investor is not satisfied with the resolution provided, he/she/they can refer the grievance(s) to the Company Secretary and Compliance Officer of the Company at:

# Mr. Kalpesh Bhupatbhai Dave

(Company Secretary and Compliance Officer)

Ambuja Tower", Opp. Sindhu Bhavan, Sindhu Bhavan Road,

Bodakdev, P.O. Thaltej, Ahmedabad - 380 054

Phone : +91-79-61556677

Fax : +91-79-61556678

E-mail Id : cs@ambujagroup.com

#### D. SCORES Platform:

In case if the grievance(s) of the investors are still not resolved to the investor's satisfaction, the investor may approach the Securities and Exchange Board of India and file their grievance through "SCORES", the centralized online system for lodging and tracking complaints.

Investors can excess SCORES portal at <a href="https://scores.sebi.gov.in">https://scores.sebi.gov.in</a>

Investors are advised to refer to the FAQs provided on SCORES portal to understand the framework for redressal of investor grievances through SCORES.

# E. Online Dispute Resolution Portal:

SEBI through its various Circular(s)/Master Circular(s) on resolution of disputes has streamlined the dispute resolution mechanism in the Indian securities market under the aegis of Stock Exchanges and Depositories by expanding their scope and by establishing a common Online Dispute Resolution Portal ("ODR Portal") which harnesses online conciliation and online arbitration for resolution of disputes arising in the Indian Securities Market.

Accordingly, in cases where investors raise issues, that require adjudication on any third party rights, on questions of law or fact or which is in the nature of a law between parties, or if investors are not satisfied with outcome of complaints filed on SCORES platform post SEBI review, they can initiate dispute resolution through the ODR portal within the prescribed timeline.

# Explanation:

a. Investors can approach the Online Dispute Resolution mechanism or other appropriate civil remedies at any point of

time. In case the complainant opts for Online Dispute Resolution mechanism or other appropriate civil remedies while the complaint is pending on SCORES, the complaint shall be treated as disposed on SCORES platform.

b. The dispute resolution through the ODR portal can be initiated only if such complaint/dispute is not pending before any arbitral process, Court, Tribunal, or Consumer Forum or if the same is non-arbitrable under Indian law.

Investors are advised to refer the relevant SEBI Circular(s) / Master Circular(s) to understand the SEBI prescribed framework for online dispute redressal of investor grievances.

#### 7. REVIEW AND AMENDMENT:

This Policy will be reviewed at least once in two years to ensure that it meets the expectations laid down by the Stakeholders Relationship Committee of the Board of Directors of the Company, changes to legislations and any other practice(s) to be incorporated, found relevant by the Company.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

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