



# **ASIAN PAINTS LIMITED**

## **INVESTORS' GRIEVANCE REDRESSAL POLICY**

Approved by the Stakeholders Relationship Committee of the Board of Directors.

Version 1: 29<sup>th</sup> July, 2022

Version 2: 3<sup>rd</sup> November, 2023

## **1. PREAMBLE AND OBJECTIVE**

This Policy is formulated to provide efficient service to the investors and to redress their grievances in a timely manner.

The Board of Directors of the Company have appointed the Company Secretary to act as the Compliance Officer as per the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), as amended from time to time and Nodal Officer under the Companies Act, 2013. The Company Secretary is responsible for providing prompt and effective services to the investors.

Link Intime India Private Limited (erstwhile TSR Consultants Private Limited), is the Registrar and Share Transfer Agent (“RTA” or “Link Intime”) of the Company and is primarily responsible for providing prompt and efficient service to the investors and in consultation with the Company, wherever required.

## **2. INVESTOR CORRESPONDENCE**

The RTA and the Company receive various correspondence from the investors, either directly or forwarded by the Stock Exchanges, Depositories or uploaded on SCORES (“SEBI Complaints Redressal System”), relating to the securities, annual reports, dividends, and other ancillary matters. These correspondences may either be complaints or queries/requests by the investors.

The Company has well-defined guidelines with respect to the classification of shareholders’ communication/grievances, servicing timelines and the process for redressal of grievances and the escalation matrix thereof.

## **3. INVESTOR SERVICE TIMELINES AND CLASSIFICATION AS GRIEVANCE**

The Company’s RTA follows the turnaround time mentioned below for the performance of the investor service requests/grievance(s) (hereinafter referred to as ‘stipulated turnaround time’):

<b>Nature of Service</b>	<b>Timeline (Number of days)</b>
<b>A. Investor Service Request</b>	
Processing of transmission request	21
Processing of issue of duplicate security certificate request	30
Processing of dematerialization request	15
Processing of remat request	30
Processing of transposition request	15

Nature of Service	Timeline (Number of days)
<b>Processing of request for change in /update of</b>	
a. Name	30
b. Signature	30
c. Nomination	30
d. Contact details (address, e-mail address and mobile number)	15
e. Bank account details	15
f. Processing of request for updation of PAN	15
Processing of revalidation request of dividend / interest / redemption instruments and remitting to the shareholders bank account	24
<b>B. IEPF Related</b>	
Processing of request for issuance of Entitlement Letter	30
Filing of E-Verification Report by the Company upon receipt of claim in Form IEPF-5	30
<b>C. Grievance Redressal</b>	
Redressal of investor grievance	21
<b>D. Request for Information</b>	
Providing response to the inquiries and request for information of the investors	
a. E-mail communication	5
b. Physical communication (Routine)	12
c. Physical or E-mail communication (disputed matters which require special handling in consultation with the Company or Advocates appointed by the Company)	30
<b>E. Other Operational Activities</b>	
Allotment of securities (IPO)	6
Intimation regarding distribution of corporate benefits (dividend, bonus, stock split)	
a. E-mail communication	15
b. Physical communication	30

In case RTA requires any additional information or supporting documents to address the investor service request/grievance, the return communication requesting the information and/or document would be released within the above-mentioned turnaround time. After receipt of requested information and/or document, the RTA would address the investor service request/grievance within respective turnaround time.

### **General manner of classification of shareholder communication**

- a. If a shareholder writes to the Company/RTA pertaining to his/her unwillingness to provide any document, or where the shareholder expresses his/her dissatisfaction over the rejection of a particular document or any other matter which is required either as per law or as per Company's Standard Operating Procedures, then the same will not be treated as a complaint.
- b. Multiple correspondence or reminders received for the same matter within the stipulated turnaround time for handling the investor service request/grievance will be treated as one complaint.
- c. If an investor request remains unresolved within the stipulated turnaround time and the matter is escalated to the designated officials of the Company, as provided in the escalation matrix below, then the same will be treated as a complaint.
- d. Escalating the matter to the designated officials of the Company before completion of the stipulated turnaround time will not be treated as a complaint.

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.

## **4. INVESTOR GRIEVANCE REDRESSAL MECHANISM**

SEBI vide its Circular(s) has mandated investors to take up their grievances for redressal with the Company, through their designated persons/officials who handle issues relating to compliance and redressal of investor grievances. In case, the Company fails to redress the complaint within the timelines prescribed, the investors may then file their complaint on SCORES.

**Following are the steps taken by the Company to handle the grievances of investors and their requests:**

- a. RTA is principally responsible for managing the share related affairs (viz. investors service requests/grievances) of the Company. The designated email address of RTA for the said purpose is [csg-unit@tcplindia.co.in](mailto:csg-unit@tcplindia.co.in).
- b. The Company has a designated email address [investor.relations@asianpaints.com](mailto:investor.relations@asianpaints.com) for assistance and redressal of the grievance(s) of the investors and is monitored by the officials of the Secretarial Department of the Company.

- c. If an investor request remains unresolved within the stipulated turnaround time, then the matter can be escalated to the designated officials of the Company, as mentioned in escalation matrix below.
- d. 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.

- e. All the investor complaints/grievances, including the ones received through SCORES, Stock Exchanges viz. BSE Limited and National Stock Exchange of India Limited, Depositories viz. National Securities Depository Limited and Central Depository Services (India) Limited, any other regulatory authorities, etc. (hereinafter referred to as 'the regulatory authorities') shall be attended and resolved by the Company expeditiously.
- f. The Company reports the following complaints to the Stock Exchanges in terms of Regulation 13(3) of the Listing Regulations on a quarterly basis:
  - i. Complaints received from the regulatory authorities by the Company and RTA;
  - ii. Complaints reported to the regulatory authorities as complaints by the RTA; and
  - iii. Grievances escalated to the designated officials of the Company, and where the request has not been addressed within the stipulated turnaround time.
- g. The statement of investor complaints, on a quarterly basis, is also placed before the Board of Directors of the Company.
- h. The Company also makes annual disclosure of the statement of investor complaints in its annual report pursuant to the requirements of the Listing Regulations.
- i. The Company obtains, annually, from the RTA, a report by their independent internal auditors on the RTA activities including the process of grievance handling. Further, the Company places the Internal Audit Report and action taken report on the observations, if any at the meeting of the Stakeholders Relationship Committee and the Board of Directors as required under applicable SEBI regulations.

## 5. 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:

#### **Link Intime India Private Limited (erstwhile TSR Consultants Private Limited)**

C-101, 1<sup>st</sup> Floor, 247 Park, L.B.S. Marg,

Vikhroli (West), Mumbai – 400 083

Tel No.: +91 810-811-8484

Fax No.: +91-22-6656 8494

Toll-Free No: 1800 2100 124 (exclusive for Asian Paints shareholders)

Email: [csg-unit@tcplindia.co.in](mailto:csg-unit@tcplindia.co.in)

Website: <https://www.tcplindia.co.in>

The updated details of collection centres are available on the website of Link Intime at <https://www.tcplindia.co.in/office-network.html> and is also available under the "Investors" Section on the website of the Company at [www.asianpaints.com](http://www.asianpaints.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:

#### **Shares Related:**

<p><b>Mr. Saurabh Mahadik</b> Executive – Secretarial Asian Paints Limited 6A, Shantinagar, Santacruz (East), Mumbai – 400 055 Tel No.: 022-6218 1186</p> <p>Email: <a href="mailto:saurabh.mahadik@asianpaints.com">saurabh.mahadik@asianpaints.com</a></p>	<p><b>Mr. Sahil Makkar</b> Assistant Manager – Secretarial Asian Paints Limited 6A, Shantinagar, Santacruz (East), Mumbai – 400 055 Tel No.: 022-6218 1097</p> <p>Email: <a href="mailto:sahil.makkar@asianpaints.com">sahil.makkar@asianpaints.com</a></p>	<p><b>Mr. Jay Shah</b> Manager – Corporate Secretarial Asian Paints Limited 6A, Shantinagar, Santacruz (East), Mumbai – 400 055 Tel No.: 022-6218 1184</p> <p>Email: <a href="mailto:shah.jay@asianpaints.com">shah.jay@asianpaints.com</a></p>
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**IEPF Related:**

<b>Mr. Siddhant Vavekar</b> Executive – Secretarial Asian Paints Limited 6A, Shantinagar, Santacruz (East), Mumbai – 400 055 Tel No.: 022-6218 1105  Email: <a href="mailto:siddhant.vavekar@asianpaints.com">siddhant.vavekar@asianpaints.com</a>	<b>Mr. Prathik Prabhu</b> Assistant Manager – Secretarial Asian Paints Limited 6A, Shantinagar, Santacruz (East), Mumbai – 400 055 Tel No.: 022-6218 3013  Email: <a href="mailto:prathik.prabhu@asianpaints.com">prathik.prabhu@asianpaints.com</a>	<b>Ms. Avani Yadav</b> Manager – Corporate Secretarial Asian Paints Limited 6A, Shantinagar, Santacruz (East), Mumbai – 400 055 Tel No.: 022-6218 1187  Email: <a href="mailto:avani.yadav@asianpaints.com">avani.yadav@asianpaints.com</a>
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**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 Deputy Company Secretary of the Company at:

**Ms. Saloni Arora**  
 Deputy Company Secretary  
 Asian Paints Limited  
 6A, Shantinagar, Santacruz (East),  
 Mumbai – 400 055  
 Tel No.: 022-6218 1139  
  
 Email: [saloni.fadnis@asianpaints.com](mailto:saloni.fadnis@asianpaints.com)

**d. Escalation Level 3 (Company):**

Wherein the grievance(s) of the investor is still not resolved to its satisfaction, he/she/they can forward their complaint to the CFO & Company Secretary of the Company at:

**Mr. R J Jeyamurugan**  
 CFO & Company Secretary  
 Asian Paints Limited  
 6A, Shantinagar, Santacruz (East),  
 Mumbai – 400 055  
 Tel No.: 022-6218 1139  
  
 Email: [rj.jeyamurugan@asianpaints.com](mailto:rj.jeyamurugan@asianpaints.com)

#### e. 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 who wish to lodge a Complaint on SCORES are required to register themselves on [www.scores.gov.in](http://www.scores.gov.in) by clicking on "Register here" under the "Investor Corner". While filing the registration form, details like the Name of the investor, Permanent Account Number (PAN), contact details, and email id, are required to be provided for effective communication and speedy redressal of the grievances. Upon successful registration, a unique user id and a password shall be generated and communicated through an acknowledgment email to the complainant.

Investors are advised to refer to the relevant SEBI Circular<sup>^</sup> to understand the SEBI prescribed framework for redressal of investor grievances.

#### f. Online Dispute Resolution Portal:

SEBI through its Master Circular<sup>^</sup> 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 Master Circular<sup>^</sup> to understand the SEBI prescribed framework for online dispute redressal of investor grievances.

<sup>^</sup> Details of relevant SEBI Circular(s)/Master Circular(s) have been provided as **Annexure A** to this Policy.



**g. Other Legal Recourse:**

In addition, investors also have the option to approach legal forums including Civil Courts, Consumer Courts, etc.

**CONTACT DETAILS OF NODAL OFFICER AND DEPUTY NODAL OFFICER OF THE COMPANY**

<b>DEPUTY NODAL OFFICER</b>	<b>NODAL OFFICER</b>
<b>Ms. Saloni Arora</b> Deputy Company Secretary Asian Paints Limited 6A, Shantinagar, Santacruz (East), Mumbai – 400 055  Email: <a href="mailto:saloni.fadnis@asianpaints.com">saloni.fadnis@asianpaints.com</a>	<b>Mr. R J Jeyamurugan</b> CFO & Company Secretary Asian Paints Limited 6A, Shantinagar, Santacruz (East), Mumbai – 400 055  Email: <a href="mailto:rj.jeyamurugan@asianpaints.com">rj.jeyamurugan@asianpaints.com</a>
Tel No.: 022-6218 1139	

**CONTACT DETAILS FOR SEEKING COMPANY RELATED INFORMATION**

<b>CORPORATE COMMUNICATIONS</b>	
<b>Mr. Arun Nair</b> Manager – Corporate Communications Asian Paints Limited 6A, Shantinagar, Santacruz (East), Mumbai – 400 055  Email: <a href="mailto:proffice@asianpaints.com">proffice@asianpaints.com</a>	<b>Ms. Sunila Martis</b> Associate General Manager – Finance Asian Paints Limited 6A, Shantinagar, Santacruz (East), Mumbai – 400 055

## **6. REVIEW OF INVESTORS’ GRIEVANCES REDRESSAL POLICY**

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.

## Details of SEBI Circular

Sr. No.	Purpose	Details of the Circular
1.	Redressal of Investor Grievances	<p><b><u>Upto 3<sup>rd</sup> December, 2023:</u></b></p> <p><a href="#"><u>SEBI Master Circular No. SEBI/HO/OIAE/IGRD/P/CIR/2022/0150 dated 7<sup>th</sup> November, 2022</u></a></p> <p><b><u>With effect from 4<sup>th</sup> December, 2023:</u></b></p> <p><a href="#"><u>SEBI Circular No. SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated 20<sup>th</sup> September, 2023</u></a></p>
2.	Online Dispute Resolution Platform	<p><a href="#"><u>SEBI Circular No. SEBI/HO/OIAE/OIAE IAD-1/P/CIR/2023/145 dated 31<sup>st</sup> July, 2023 (updated as on 11<sup>th</sup> August, 2023)</u></a></p>