

Investor Grievance Redressal Policy

HELPAGE FINLEASE LIMITED

CIN: L51909DL1982PLC014434

I. Title:

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

II. Background:

The Company's equity shares are listed on the recognized stock exchanges viz., Bombay Stock Exchange of India Limited.

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 **Beetal Financial & Computer Services Pvt. Ltd.** (RTA) 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.

Beetal Financial & Computer Services Pvt. Ltd. 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 Company Secretary & Compliance Officer of the Company and RTA contact details mentioned on the website of the Company.

The Company also has a designated email ID info@helpagefinlease.com 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.

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

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 endeavour 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.

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 Duplicate Certificate
- Non-Receipt of Securities after Transfer / Transmission / Name Deletion / Change of Name.

VII. Escalation Matrix:

Investors can refer the below given escalation matrix in case they do not receive any revert from RTA/ Company within the timelines specified above.

Level 1	Registrar and Transfer Agent: BEETAL FINANCIAL & COMPUTER SERVICES PVT. LTD. Beetal House, 3rd Floor, 99 Madangir, Behind Local Shopping Centre, Near Dada Harsukhdas Mandir, New Delhi-110062 Tel: - +91-11-29961281-83 Email: beetal@beetalfinancial.com
Level 2	Company Secretary and Compliance Officer Ms. Darshna Agrawal Telephone: +91-11-4557-8607 Email : info@helpagefinlease.com Website: www.helpagefinlease.com
Level 3	SEBI SCORES In case any of the investors is not satisfied with the response furnished by the Company to his/ her complaint, he/ she may refer it to “SCORES”, the centralized online system for lodging and tracking complaints made available by SEBI. SCORES facility can be accessed through the web link https://scores.gov.in

Contact details of the Nodal Officer for IEPF related queries:

Company Secretary and Compliance Officer

Ms. Darshna Agrawal

Telephone: +91-11-4557-8607

Email : info@helpagefinlease.com

Website: www.helpagefinlease.com

Miscellaneous:

- The Policy shall be disclosed on the website of the Company.
- The Company Secretary 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 before for noting and ratification of the SRC at its subsequent meeting.