



Aptus Pharma Limited

Connecting.....Life

P POLICY ON INVESTORS' GRIEVANCE REDRESSAL MECHANISM



Contents

1. Preamble and Objective.....	3
2. Definition.....	3
3. Scope	4
4. Investors Communication.....	4
5. Investor Services Timeslines and classification as Grivance	4
6. Investor Grievance Redressal Mechanism	9
7. Contact Details	11
8. Amendment & Disclosure	5

1. PREAMBLE AND OBJECTIVE.

The Company is committed to adhere to the highest standards of investor relations and provide efficient services to them and effectively address and redress their grievances in a timely manner.

With this objective, the Company has formulated the Policy on Investors' Grievance Redressal Mechanism.

To serve the investors in a faster and efficient manner, the Company has appointed Bigshare Services Private Limited as its Registrar & Share Transfer Agents to the Issue (RTAI) and Accurate Securities and Registry Private Limited (RTA), which is Company Registrar & Share Transfer Agents. The RTA and RTAI are primarily responsible for handling security holders' related affairs of the Company. For contact detail, refer to Contact Detail of RTA/RTAI mentioned in this Policy.

The Company Secretary of the Company acts as the Compliance Officer of the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LoDR") and Nodal Officer under the Companies Act, 2013 and is responsible for ensuring provision of prompt and effective services to the investors and monitoring the dedicated email address of the Company for investor grievances.

2. DEFINITION.

- a) **"Board"** means the Board of Directors of Aptus Pharma Limited.
- b) **"Company"** means Aptus Pharma Limited.
- c) **"Policy"** mean this Policy on Investors' Grievance Redressal Mechanism.
- d) **"SCORES"** is a web based centralized grievance redress system of SEBI (<http://scores.gov.in>), which enables the investors to lodge and follow up their complaints and track the status of redressal of such complaints online from the above website from anywhere
- e) **"Stipulated Turnaround Time"** means the timelines as specified in the Investor Service Timelines and Classification as Grievance section of this Policy. The words and phrases not defined under this Policy will carry the same meaning as defined under the Articles of Association of the Company; the Securities and Exchange Board of India Act, 1992 read with the rules and regulations made thereunder,

including the LoDR; and the Companies Act, 2013 read with the rules made thereunder.

3. SCOPE.

The coverage of this policy is to redress the grievance of all the securities issued by the Company, which are listed on the stock exchanges in India or abroad.

The equity shares of the Company are proposed to be listed on the SME Platform of BSE Limited (www.bsesme.com)

4. INVESTORS COMMUNICATIONS.

The RTA/RTAI and the Company receives various correspondence / communication from the investors, either directly or forwarded by the stock exchanges or uploaded on the SEBI's SCORES platform, relating to the securities, annual reports, dividends and ancillary matters. These communications may either be complaints or mere queries / requests by the security holders.

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

5. INVESTOR SERVICE TIMELINES AND CLASSIFICATION AS GRIEVANCE.

The Company and its RTA/RTAI shall follow the following timelines for performance of their respective duties towards the investors:

- a) Requests for change of address, non-receipt of annual reports, notice of general meetings, updation of bank details (for holdings in physical form) are addressed by the RTA/RTAI within a period of 7 working days from the receipt of the request or in case, any supporting documents are required by the RTA/RTAI for addressing the request, within a period of 7 working days from the receipt of such documents to the RTA/RTAI's satisfaction.
- b) Requests for transfers/ transmission/ duplicate security certificate, change of name, dematerialization, and loss of security certificates and other matters not specified in (a) above, are addressed by the RTA/RTAI within a period of 7 to 15 days from the receipt of the request. In case, any supporting documents are required

by the RTA/RTAI from the investor or any other party for addressing the request, such matters shall be addressed within a period of 15 days from the receipt of such documents to the RTA/RTAI's satisfaction.

- c) Matters not specifically mentioned herein above and for the redressal of which, if any statutory timelines have been prescribed, the Company and the RTA/RTAI shall address such grievance within the timeline as prescribed under the statute or within maximum 15 days, whichever is earlier.

Classification of security holders' communication as Grievance.

- a. Multiple correspondence / communications or reminders received for the same matter within the Stipulated Turnaround Time for handling of the query / communication shall be treated as grievance.
- b. If a query is resolved after the Stipulated Turnaround Time and there is no reminder from the investor during such time period, such query shall not be treated as complaint.
- c. 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.
- d. For clarity, examples of request v/s complaint / grievance are presented below:

Sr. No.	Communication not treated as complaint	Communication treated as complaint
1	Non-receipt of annual report	
	First request or any such communication w.r.t. non - receipt of annual report will be considered as a request if, the Company has dispatched the annual report to the security holder on or before the due date(s) through permissible means.	Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if, (a) the Company /RTA/RTAI has not dispatched the annual report to the security holder on or before the due date(s), or



	Such communication shall be treated as request for an additional copy of the annual report. The Company shall respond to the request by intimating the original date of dispatch of annual report and will also share a copy of the annual report in compliance with the security holder's request.	(b) the Company / RTA/RTAI has not responded to investor's request within the Stipulated Turnaround Time.
2	Non-receipt of dividend / Interest / Principal amount	
	First request or any such communication w.r.t. non-receipt of dividend / interest/ principal will be considered as a query / request if, the Company has credited the dividend/ interest / principal to the bank account of the investor or dispatched dividend/ interest / principal amount warrants / demand drafts on or before the due date(s). When the Company is unable to pay out the dividend/ interest/ principal: a) In case where the dividend/ interest/ principal is to be credited to the bank account of the investor, and such credit has been declined by the bank, the Company will pay out the dividend/ interest/ principal through a warrant / demand draft in favor of the investor. b) In case the dispatched dividend/ interest/ principal warrant / demand draft is returned undelivered, the Company will proceed with re-dispatching the dividend/ interest/ principal warrant / demand draft	Any communication w.r.t. non-receipt of dividend/ interest/ principal warrants / demand drafts sent to the Company or to the RTA/RTAI after the expiry of the Stipulated Turnaround Time for issuance of duplicate dividend/ interest/ principal warrant will be considered as a complaint.



3	Non-receipt of securities' certificates	
	Non-receipt of duly authenticated security certificate(s) upon sub- division / transfer / transmission / consolidation / re-materialization will be considered as a query if, the Company has dispatched the security certificates within prescribed time limits. The Company shall respond to the query by sharing details of dispatch to the investor. It is clarified that upon the dispatch of security certificate through registered post or courier or any other approved mode, the Company shall be deemed to have discharged its duty and the investor are expected to coordinate with the postal / courier agency for the securities certificates dispatched.	Communication w.r.t. non-receipt of duly authenticated security certificate(s) after the expiry of the statutory period for giving effect to the respective request will be treated as a complaint if, the Company has not dispatched the security certificates to the investor.
4	Security holder communication through statutory authorities	
	Any communication from investors through statutory authorities which is not treated as a complaint by the statutory authority, and 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. As per SEBI circular dated March 26, 2018, any grievances submitted to SEBI through SCORES will not be treated as complaints if the grievance is redressed by the Company within	At times, requests / grievances are directly communicated to the statutory authorities by the investors. Such communications may not always qualify as a complaint under the guidelines adopted by the Company. However, since the statutory authorities treat all communication received from investors as complaint, regardless of the nature of such communication, the Company is constrained to follow the classification as followed by the statutory authorities. Accordingly, any
	30 days. Accordingly, such grievances registered with SEBI, will not be treated as complaints by the Company.	communication from investors received through statutory authorities viz. stock exchanges, Registrar of Companies, Regional Directors, SEBI, etc. which is treated as complaint by such statutory authority, will be treated as a complaint by the Company.



5	Miscellaneous	
	Correspondence w.r.t. change in address, nominees etc. will be considered as a request and not as a complaint if, the request is addressed within the Stipulated Turnaround Time. Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint. Any communication requisitioning information or documents relating to the Company or its operations as per statutory rights available to the investor will be treated as request if, the requisition is in proper format and the Company has responded to the same within prescribed time limits. Incomplete communications, communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint. Communications / complaints in relation to matters that are subjudice will not be treated as a complaint under this Policy.	Any communication from the investor not responded to by the Company or not responded by the Company within the Stipulated Turnaround Time will be considered as complaint.

6. INVESTOR GRIEVANCE REDRESSAL MECHANISM.

- a) Investors can lodge a complaint for non-receipt of any right available to them or failure of the RTA/RTAI / Company by giving details of their name, folio no., DP ID / Client ID, nature and full particulars of their complaint directly to the RTA/RTAI, except for matters relating to securities / dividend transferred to Investor Education and Protection Fund (IEPF).

For IEPF related matters, investors can directly contact the Nodal Officer appointed by the Company as specified under this section of this Policy.

- b) Any information, other than those specified above or any supporting documentation required for redressal of the complaint shall be informed to the investors by the RTA/RTAI within the timeline specified under the Investor Service Timelines and Classification as Grievance section of this Policy.

Investors are requested to furnish all the requisite information along with duly executed documents at the earliest to avoid any delay in redressal of their complaints.

- c) In case of non-satisfactory response from RTA/RTAI or non-receipt of a reply from the RTA/RTAI within the Stipulated Turnaround Time, investors may approach and lodge their complaints through the Company's designated email id for investor grievances – complianceofficer@aptuspharma.com

The designated email id is also displayed on the Company's website www.aptus-pharma.com.

Alternatively, investors can send their complaints at the registered office or the corporate office of the Company.

If the investor does not receive a reply from the RTA/RTAI within the stipulated turnaround time, he / she may approach the Company at the credentials mentioned above.

- d) Investors are requested to approach the RTA/RTAI, or in case of any inaction by the RTA/RTAI, the Company, for redressal of their concerns prior to raising their concerns with the regulatory authorities.

- e) Only complaints sent on the addresses / email ids mentioned in this Policy will be treated as valid complaints.
- f) The Company periodically obtains status report of the complaints from the RTA/RTAI. The Company also obtains, annually, from the RTA/RTAI, report by their independent internal auditors on the RTA/RTAI activities including the process of grievance handling.
- g) As required under Regulation 13 of the LoDR, the Company files with the Stock Exchanges and places the statement of investor complaints at the Board meeting on a quarterly basis. Further, the Company also makes annual disclosure of the statement of investor complaints in its annual report pursuant to the LoDR. Further, the Company places the Internal Audit Report at the Board meeting as required under applicable SEBI regulations.
- h) The Stakeholders Relationship Committee is responsible for the examination and redressal of the complaints by investors and the Committee periodically reviews the effectiveness of the redressal mechanism.
- i) The escalation matrix for complaints relating to the securities of the Company is as provided below:

Level 1	Mohini Hardikbhai Gandhi - Company Secretary & Compliance Officer Aptus Pharma Limited Address: Ashutosh Buildcon, Opp. Slok - 2, Nr. Harikrupa Logistic Park, Aslali, Ahmedabad, Daskroi, Gujarat, India, 382427. Telephone: +91 76004 27827 E-mail: complianceofficer@aptuspharma.com
Level 2	Mr. Tejash Maheshchandra Hathi – Managing Director, Aptus Pharma Limited, Registered office: Ashutosh Buildcon, Opp. Slok - 2, Nr. Harikrupa Logistic Park, Aslali, Ahmedabad, Daskroi, Gujarat, India, 382427. Corporate Office: SHREE Building 1st Floor Opp Satyasai Heart Hospital, Narayan Nagar Kalawad Road, Rajkot Sau Uni Area Rajkot, Gujarat, 360005 Telephone: +91 76004 27827 E-mail: info@aptuspharma.com
Level 3	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. SCORES facility can be accessed through the web link https://scores.sebi.gov.in/

	Filing complaints on SCORES - Easy & quick a) Register on SCORES RTA/RTAI Mandatory details for filing complaints on SCORES are name, PAN, address, mobile number, E-mail ID of the complainant.
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7. CONTACT DETAILS

CONTACT DETAILS OF THE RTAI

Bigshare Services Private Limited

Address: Office No. S6-2, 6th Floor, Pinnacle Business Park, Next to Ahura Centre, Mahakali Caves Road, Andheri (East), Mumbai – 400093, Maharashtra, India

Tel No.: +91 22-62638200

Website: www.bigshareonline.com

E-Mail: ipo@bigshareonline.com

Investor Grievance Email: investor@bigshareonline.com

Contact Person: Mr. Babu Rapheal C.

CONTACT DETAILS OF THE RTA

Accurate Securities and Registry Private Limited

Address: B1105- 1108, K P Epitome, Nr. Makarba Lake, Nr. Siddhi Vinayak Towers, Makarba, Ahmedabad – 380051

Contact No.: +91-9427633901

Website: www accuratesecurities.com

Investor Email:- investor@accuratesecurities.com

E-Mail: info@accuratesecurities.com

Contact Person: **CS Ankur Shah.**

8. AMENDMENT & DISCLOSURE

The Board (including its duly constituted committees wherever permissible), shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy. This Policy shall automatically stand amended to reflect any changes to the SEBI Regulations, to the extent the same is the subject matter of this Pol