



BHARTI HEXACOM LIMITED

Investor Grievance Policy



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1. Preamble & Objective

In terms of the provisions of Regulation 13 the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), read with the applicable circulars, guidelines, and directions issued by the Securities and Exchange Board of India ("SEBI") from time to time (collectively referred to as the "applicable laws"), Bharti Hexacom Limited ("Hexacom") is required to have adequate system to resolve the investor grievances promptly.

This Policy on Investor Grievance aims to achieve the following objectives:

- (a) To establish a transparent mechanism to resolve investor grievances.
- (b) To maintain accessible and reliable communication channels for investor queries along with escalation matrix.
- (c) To ensure timely and efficient resolution for investor queries or complaints.
- (d) To utilise investor feedback as a constructive input, for improvement of the investor service quality.

2. Process for redressal of Grievance

To ensure smooth and efficient servicing of investor requests, the Company has laid down the following procedure, in coordination with its Registrar and Share Transfer Agent ("RTA"), KFin Technologies Limited.

(a) Channels of submission:

The details of channels of communication can be either, email or physical requests as per the Escalation Matrix provided in this Policy. The first point of contact for any of the queries should be the RTA.

(b) Mandatory documents/ information to process investor grievance requests:

i. Mandatory information:

- **Folio Number/ DP-id/ Client-id:** It is mandatory for investors to quote Folio number/ DP-id/ Client-id in all the requests submitted through email or physical letter



- **Correspondence from registered email:** If investor wishes to correspond through email, the investor shall use email id registered against folio number/DP-id/Client-id.
- ii. **KYC updated for physical security holders:** It shall be mandatory for all holders of physical securities to update their KYC viz PAN, Contact details (Postal Address with PIN and Mobile Number), Bank A/c details and Specimen signature etc. for their corresponding folio numbers for RTA or the Company to resolve their query. The KYC can be updated through prescribed forms issued by SEBI, which are available on the website of the Company and can be accessed by [clicking here](#). Please note that the Company/ RTA will not be able to process any request unless the KYC is updated.
- iii. **KYC for demat holders:** Investors holding shares in dematerialised form are required to route their requests (e.g., change in bank/ KYC details, nominations) directly through their respective Depository Participants ("DPs").
- iv. **Prescribed forms and documentation:** Investors are required to submit requests in the prescribed formats (where applicable), as issued by SEBI. These formats, along with document checklists, are available on the Company's website and can be accessed by [clicking here](#).

(c) Timelines for Processing

Service requests will be processed in accordance with the timelines for Investor Services, as provided in **Annexure I** to this Policy on the lines of SEBI Master Circular dated May 07, 2024 as amended from time to time. The timelines will be computed from the date of receipt of complete and valid documents/ information.

3. Matters not treated as Investor Complaints

Following category of requests/ queries will not be treated as Investor Complaints:

- (a) Requests/ queries resolved or responded within stipulated timelines (as per Annexure I).
- (b) Submissions pending clarification or additional documents from the investor.
- (c) Any query which is general in nature like query relating to customer service, job, business proposals and marketing etc.

The Compliance Officer will determine the final classification of any communication, based on the facts and context of each case, and ensure that appropriate action is taken.



4. Escalation Matrix for Investor Grievances

To ensure structured and transparent handling of investor grievances, the Company has implemented the following four-tier escalation mechanism:

Level 1: KFin Technologies Limited, Registrar & Share Transfer Agent (RTA)

Investors are advised to first approach **KFin Technologies Limited**, the Company's RTA, for all queries and grievances. The RTA is responsible for processing requests such as transmission, issue of duplicate share certificates, KYC updates, dividend-related issues, and other routine matters in accordance with the timelines specified in **Annexure I**:

Contact details	Address
Mr. S. R. Ramesh Deputy Vice President KFin Technologies Limited, Registrar and Share Transfer Agent Email: einward.ris@kfintech.com	Karvy Selenium Tower B, Plot number 31 & 32, Gachibowli, Financial District, Nanakramguda, Serilingampally Mandal, Hyderabad - 500032, India Telephone No. - 040-67162222 Fax No.- 040-23001153 Website: www.kfintech.com

Level 2: Investor Services Team & Compliance Officer, Bharti Hexacom Limited

If the investor does not receive a response from the RTA within the stipulated timelines or is dissatisfied with the resolution, the matter may be escalated to the **Investor Services Team** of the Company:

Contact details	Address
Mr. Amit Chaturvedi Company Secretary & Compliance Officer Email: bhartihexacom@bharti.in	Bharti Hexacom Limited Bharti Crescent, 1, Nelson Mandela Road, Vasant Kunj, Phase - II, New Delhi 110 070, India Telephone no.- +91-11-46666100 Fax no.- +91-11-41666137 Registered Office Airtel Center, Plot No. 16, Udyog Vihar, Phase-IV, Gurugram - 122015, India Telephone no. +91-124-4222222, Fax no. +91-124-4248063



Level 3: SEBI SCORES Platform

In case the grievance remains unresolved at the Company/ RTA level, investors may lodge a complaint on the SEBI Complaints Redress System – **SCORES** (www.scores.gov.in).

Level 4: SEBI Online Dispute Resolution (ODR) Portal

If the investor remains dissatisfied even after completion of the SCORES review process or wishes to seek alternate resolution, they may initiate a complaint through SEBI's Online Dispute Resolution platform – **SMART ODR** (www.smartodr.in).

5. Miscellaneous

This Policy shall be reviewed periodically to ensure continued compliance with applicable laws and alignment with regulatory expectations and industry practices.

Any change in the applicable laws, regulations, or guidelines shall automatically apply to this Policy, even if not specifically incorporated herein.

In case of any inconsistency between the provisions of this Policy and applicable laws, the provisions of the applicable laws shall prevail. Any matters not explicitly covered under this Policy shall be dealt with in accordance with the relevant legal and regulatory framework in force.



Annexure I

Timelines for Investor Services by RTA

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

S. No	Nature of Service	Expected timeline to reply (Number of days)
A	Investor Service Request:	
a.	Processing of transmission request	21
b.	Processing of issue of duplicate security certificate request	30
c.	Processing of dematerialization request	15
d.	Processing of Rematerialization request	30
e.	Processing of Transposition request	15
f.	I. Processing of request for change in / updation of: [KYC]	
	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
	II. Processing of request for Updation of PAN	15
g.	Processing of Re-validation of dividend/ interest/ redemption instruments and sending the remittance request files to the bank	15
B	Grievance Redressal	
a.	Providing response to the inquiries of the investors and Redressal of Grievance	21
C	Other Operational activities	
a.	Allotment of securities (IPO)	6
b.	Intimation regarding distribution of corporate benefits (dividend, bonus, stock Split)	
	i. E-mail communication	15
	ii. Physical communication	30