



NILACHAL REFRATORIES LIMITED

CIN: L26939OR1977PLC000735

30, J.L. Nehru Road, Kolkata – 700016, W.B. Ph.: 033 – 224 99511,

NILACHAL REFRATORIES LIMITED

INVESTOR GRIEVANCE REDRESSAL POLICY

1.OVERVIEW

1.1 Preface

This Policy shall be called ‘Investor Grievance Redressal Policy.’



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1.2 Preamble and Objective

The objective of the policy is to address the grievances of the investors. 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. The policy was approved by the Stakeholders Relationship Committee of the Board.

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 shares as and if declared by the Company, (iii) annual reports and AGM notice, and (iii) such other rights available under the Law for the time being in force.

The Company has appointed M/s S. K. Infosolutions Pvt. Ltd (Registered with SEBI) as the Company's Registrar and Share Transfer Agent ("STA") to ensure faster and efficient provision of services to the investors. The STA is primarily responsible for handling shareholders related affairs of the Company.

The Board has appointed the Company Secretary to act as a Compliance Officer of the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations'). As a 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.

1.3 Definitions

For the purpose of this policy, the following words will carry the meaning as under:

"Board/Directors" means the Board of Directors of Nilachal Refractories Limited, as constituted from time to time;

"Company" means Nilachal Refractories Limited;

"STA" shall mean Share Transfer Agent

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, or any other applicable law/regulation/rules.



2. Classification of Shareholder Communication

The Company receives various correspondence/communication from the investors relating to the shares, annual reports, 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.

The Company strives to follow highest standards of corporate governance, transparency and disclosures at all times. With a view to ensure greater transparency and as a part of Company's investor-friendly initiatives, the Stakeholders Relationship Committee has considered it appropriate and desirable to formally document the present guidelines w.r.t classification of shareholders' communication through this Policy.

In addition to the above, the Policy lays down the process for redressal of complaints thereof.

General Principle guiding classification of shareholders' communication

- a) Multiple correspondence/communications or reminders received for the same matter for handling of the query/communication will be treated as one complaint.
- b) If a query is resolved after time mentioned in the applicable laws, as the case may be, and there is no reminder from the shareholder during such time period, such query will 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.

Classification of Shareholders Communication

Sl no	Communication not treated as complaint	Communication treated as complaint
A)	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 shareholder on or before the due date(s)	Subsequent request(s) for nonreceipt of annual report to be treated and recorded as a complaint if, the Company / STA has not dispatched the annual report to the shareholder



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	<p>through permissible means. Such communication shall be treated as request for an additional copy of the annual report. 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 shareholder's request.</p>	<p>on or before the due date(s), or the Company / STA has not responded to shareholder's request within the stipulated time limit.</p>
B)	Non-receipt of Share certificates	
	<p>Non-receipt of duly authenticated share certificate(s) upon/ sub-division/ transfer/ transmission consolidation /re-materialization will be considered as a query if, the Company has dispatched the share certificates within prescribed time limits.</p> <p>The Company shall respond to the query by sharing details of dispatch to the shareholders. It is clarified that upon the dispatch of share certificate through registered post or courier or any other approved mode, the Company shall be deemed to have discharged its duty and the shareholders are expected to coordinate with the postal / courier agency for the share certificates dispatched</p>	<p>Communication w.r.t. non receipt of duly authenticated share 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 share certificates to the shareholder.</p>
C)	Shareholder communication through Statutory Authorities	
	<p>Any communication from investors through statutory authorities which:</p> <p>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.</p> <p>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 30days. Accordingly, such grievances</p>	<p>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.</p> <p>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</p>



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	<p>registered with SEBI, will be not treated as complaints by the Company.</p>	<p>classification as followed by the statutory authorities.</p> <p>Accordingly, any 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.</p>
D)	Others	
	<p>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 reasonable time limit.</p> <p>Any communication / suggestions /enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint. Communication not treated as complaint</p>	<p>Any communication from the Investor not responded to by the Company or not responded by the Company within the reasonable time will be considered as complaint.</p>
	<p>Any communication requisitioning information or documents relating to the Company or its operations as per statutory rights available to the shareholders will be treated as request if, the requisition is in proper format and the Company has responded to the same within prescribed time limits.</p> <p>Incomplete communications, communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint.</p> <p>Communications / complaints in relation to matters that are subjudice will not be treated as a complaint under this Policy.</p>	



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2.1 Investor Grievance Redressal Mechanism

Investors can lodge a complaint for non-receipt of any right available to them or failure of the STA / Company to comply with any statutory obligation by giving details of their name, folio no., DP ID / Client ID, nature and full particulars of their complaint directly to the STA, except for matters relating to shares / dividend transferred to Investor Education and Protection Fund (IEPF). For IEPF related matters, investors can directly contact the Compliance Officer appointed by the Company as specified under the Contact Details section of this Policy.

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 STA.

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.

In case of non-satisfactory response/ non-receipt of reply from STA, investors can also lodge their complaints through the Company's designated email id for investor grievances cs@nilachal.in. The designated email id is also displayed on the Company's website. Alternatively, investors can send their complaints at the registered office of the Company.

Investors are requested to approach the STA, or in case of any inaction by the STA, the Company, for redressal of their concerns prior to raising their concerns with the regulatory authorities.

Only complaints sent on the addresses / email ids mentioned in this Policy will be treated as valid complaints.

The Company periodically obtains status report of the complaints from the STA as mentioned in the Preamble and Objective of the Policy.

The Stakeholders Relationship Committee is responsible for the examination and redressal of the complaints by investors.

As required under Regulation 13 of Listing Regulations, 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 Listing Regulations.



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Contact Details:

The Company has designated Company Secretary of the Company as Compliance Officer.

Mr. Ashish Kumar Bhalotia, Company Secretary

Address: 43/D, Sikdarpara Street, 1St Floor, Kolkata-700007

Phone no(s): 033-4002 6507

Email: cs@nilachal.in

Website: www.nilachal.in

Registrar and Share Transfer Agent (STA)

S. K. Infosolutions Pvt. Ltd

D/42, Katju Nagar

(Near South City Mall), Ground Floor

Katju Nagar Bazar, Jadavpur

KOLKATA – 700032

Phone : +91 033-24120027 & +91 033-24120029

Fax : +91 33 2219 4815

E-mail : skcomputers_kolkata@vsnl.net & skcdilip@gmail.com

3. Amendment to the Policy

The Company Secretary is authorised to amend the Policy to give effect to any changes / amendments notified by the Ministry of Corporate Affairs (MCA) or SEBI. The amended Policy shall be placed before the Stakeholder Relationship Committee for noting and ratification.

This policy can be modified, withdrawn or suspended by the Company at its sole discretion without any prior intimation.



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4. Publication of this Policy

This Policy and any amendments thereto shall be published / posted on the website of the Company i.e. www.nilachal.in