

INVESTOR GRIEVANCE REDRESSAL POLICY

TITLE:-

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

PREAMBLE AND OBJECTIVE: -

The Equity shares of the Company are listed on BSE Limited (BSE) & the National Stock Exchange of India Limited (NSE).

The investors, at times seek redressal of their concerns on matters they are entitled to, which includes, timely receipt of dividend declared by the Company, Receipt of Annual Reports, Financial statements and AGM Notice, guidance with matters related to IEPF, receipt of share, etc. and such other rights as prescribed under the law for the time being in force and 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.

The objective of this policy is to attend and address those Investor grievances, requests, queries and any other concern from them in a timely and efficient manner. The Policy recognises the investors' right to always have a contact available, to enable them to register their queries or record a grievance.

The matters related to transfer of securities of the Company & Shareholders/Investors Grievance and related function of the Company are outsourced to Company's Registrars and Transfer Agent - KFin Technologies Ltd. (Formerly known as KFin Technologies Pvt Ltd.) (RTA). The Secretarial Department oversees the activities of the RTA to ensure timely and prompt service in investor related matters.

DEFINITION:-

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

"Company" means Glemark Pharmaceuticals Limited.

"Board of Directors" or "Board" means the collective body of the Directors of the Company.

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 Listing Regulations; and the Companies Act, 2013 read with the rules made thereunder.

GRIEVANCE HANDLING MECHANISM:-

1. The RTA of the Company is primarily responsible to resolve the investor's grievances on behalf of the Company. RTA is entrusted with handling matters related to shares viz., transfer, 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. as well as other matters.
2. 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 prompt and effective services to the shareholders.
3. The Company has a dedicated email ID – Complianceofficer@glenmarkpharma.com, which is dedicated to address/ receive the grievances. The RTA of the Company also has designated email ID for investor services viz., inward.ris@kfintech.com which is also made available on the website of the Company to the investors for lodging their grievance.
4. Investors can lodge a complaint for non-receipt of any right available to them or failure of the RTA / 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 RTA or the compliance officer at the email id mentioned above which is also displayed on the Company's website, including for matters relating to shares / dividend transferred to Investor Education and Protection Fund (IEPF).
5. Secretarial Department of the Company accesses the above mentioned designated investor grievances e-mail ID on a regular basis to ensure timely redress of investor's grievances.
6. Further, if the RTA is in need of any further documents or clarification for redressal of the complaint, the same shall be communicated to the investor by RTA. Investors are hence requested to co-operate with the RTA and provide the needful to avoid any delay in redressal of their complaints.
7. Investors are requested to approach the RTA, or in case of any inaction by the RTA, the Company, for redressal of their concerns prior to raising their concerns with the regulatory authorities.
8. For the Complaint to be addressed in a timely and efficient manner it is advisable to lodge the complaints through the means specified in this policy.
9. The Company periodically obtains status report of the complaints from the RTA. The status report so received along with the necessary backups including original letter of complaint/ request/ query received by the investor, date or receipt of such complaint/ request, date of resolving the complaint/ addressing the request so received, etc., before

the Stakeholders Relationship Committee (SRC) for responsible examination and redressal of the complaints by investors.

The SRC functions under the Chairmanship of an Independent Director and meets as often as required to resolve shareholders' grievances including complaints related to transmission of shares, non-receipt of annual report, non-receipt of declared dividends, issue of new/duplicate certificates etc. The SRC also reviews measures taken by the Company for effective exercise of voting rights by Shareholders.

10. As obligated under the Regulation 13 of the SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015, the Company periodically files with the Stock Exchanges the statement of Investor complaint received, places the same before the Board of Directors for their review and information and also discloses the same in the Company's Annual Report.
11. All the investor complaints/ grievances received through "SEBI Complaints Redress System" (SCORES Portal) are checked regularly and are being attended and resolved expeditiously.

INVESTOR SERVICE TIMELINES (TURNAROUND TIME):-

The Company and its RTA 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 within a period of 7 working days from the receipt of the request.
- b) Requests for matters including but not limited to 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 within a period of 15 days from the receipt of the request.

NOTE: In case, there is a need by RTA of any supporting documents or clarification for addressing the investor request/ query, the said matters shall be addressed within a period of 7 days from the receipt of such supporting documents/ clarification as the case may be, to the RTA'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 shall address such grievance within the timeline as prescribed under the statute or within maximum 30 days, whichever is earlier.

CLASSIFICATION OF SHAREHOLDERS' COMMUNICATION:

- Multiple correspondence / communications or reminders received for the same matter within the stipulated turnaround time in this Policy for handling of the query / communication will be not be treated as complaint. And such multiple correspondence / communications or reminders received after the stipulated Turnaround Time, will be treated as one complaint.
- If a query is resolved after the stipulated turnaround time and there is no reminder from the shareholder during such time period, such query will not be treated as 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.

For better clarity, kindly refer below table to assist in identifying several types of Investor’s communications as Requests or Complaints/ grievance:

Sr. No.	Communication not to be treated as Complaint <u>but a mere request</u>	Communication treated as complaint
1.	Non-receipt of annual report	
	<p>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 through permissible means.</p> <p>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>Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if,</p> <ul style="list-style-type: none"> ➤ the Company / RTA has not dispatched the annual report to the shareholder on or before the due date, or ➤ the Company / RTA has not responded to shareholder’s request within the stipulated turnaround time.
b.	Non-receipt of dividend	
	<p>First request or any such communication w.r.t. non-receipt of dividend will be considered as a query / request if, the Company has credited the dividend to the bank account of the shareholder or dispatched dividend warrants / demand drafts on or before the due</p>	<p>Any communication w.r.t. non-receipt of dividend warrants / demand drafts sent to the Company or to the RTA after the expiry of the stipulated turnaround time for issuance of duplicate dividend warrant will be considered as complaint.</p>

	<p>date(s).</p> <p>When the Company is unable to pay out the dividend:</p> <ul style="list-style-type: none"> ➤ In case where the dividend is to be credited to the bank account of the shareholder, and such credit has been declined by the bank, the Company will pay out the dividend through a dividend warrant / demand draft in favour of the shareholder. ➤ In case the dispatched dividend warrant / demand draft is returned undelivered, the Company will proceed with re-dispatching the dividend warrant / demand draft only upon a written request by the shareholder. Such communication from the shareholder will be treated as a request and not a complaint. 	
c.	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>

d.	Shareholder communication through statutory authorities	
	<p>Any communication from investors through statutory authorities which:</p> <ul style="list-style-type: none"> ➤ 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>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 30 days. Accordingly, such grievances registered with SEBI, will not be treated as complaints by the Company.</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>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>
e.	Others	
	<ul style="list-style-type: none"> i. Correspondence w.r.t. change in address, nominees etc. will be considered as a request and not a complaint if, the request is addressed within the stipulated turnaround time. ii. Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint. iii. 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. iv. Incomplete communications, communications without requisite 	<p>Any communication from the investor not responded to by the Company/ RTA within the stipulated turnaround time will be considered as complaint.</p>

	<p>supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint.</p> <p>v. Communications / complaints in relation to matters that are sub-judice will not be treated as a complaint.</p>	
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CONTACT DETAILS:-

	Contact details	Address
Kfin Technologies Limited (Formerly known as KFin Technologies Private Limited), (RTA)	KFin Technologies Limited Registrar and Transfer Agents Email: einward.ris@karvy.com	Karvy Selenium Tower B, Plot No.: 31 & 32, Gachibowli, Financial District, Nanakramguda, Serilingampally, Hyderabad – 500 032, Telangana Tel: (040) 6716 2222 / 6716 1511 Fax: (040) 2300 1153
Glenmark Pharmaceuticals Limited (Company)	Mr. Harish Kuber, Company Secretary and Compliance Officer Glenmark Pharmaceuticals Limited Email: complianceofficer@glenmarkpharma.com	Glenmark Pharmaceuticals Limited, Glenmark House, B D Sawant Marg, Andheri East, Mumbai – 400 099, India (T) : 91 22 4018 9999 (F) : 91 22 4018 9986

MISCELLANEOUS:

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

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

This Policy has been approved by the Stakeholders Relationship Committee of the Board in its meeting held on 27th May, 2022.
