



One 97 Communications Limited
Investor Grievance Redressal Policy
Version 2.0

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Table of Contents

Preamble	3
Objective	3
Definitions	3
Classification of Shareholder Communication.....	4
General Principle guiding classification of shareholders' communication	4
Investor Service Timelines.....	8
KYC requirements for shareholders	9
Investor Grievance Redressal Mechanism.....	9
Investor Contact Details and Escalation Matrix.....	10
Policy on maintenance of stationery and other documents.....	11
Miscellaneous.....	11

Preamble

One 97 Communications Limited (“Company”) strives to follow highest standards of corporate governance, transparency, and disclosures at all times. Prompt and efficient service is essential for retaining existing relationships and therefore investor satisfaction becomes critical to the Company. This policy is formulated to provide efficient services to the investors and to effectively address and redress their grievances in a timely manner and details grievance handling through a structured grievance redressal framework.

The equity shares of the Company are listed on BSE Limited (BSE) and National Stock Exchange of India Limited (NSE). The Company has appointed Link Intime India Private Limited as its Registrar & Share Transfer Agent (“RTA”) to ensure faster and efficient provision of services to the investors. The RTA is primarily responsible for handling shareholder-related affairs of the Company.

In accordance with various statutory provisions and by virtue of their ownership of shares in the company, shareholders have been endowed with certain entitlements, referred to as the ‘Rights of Shareholders.’ The Company has compiled an illustrative list of these rights, which can be accessed on the Company's website at <https://ir.paytm.com/rights-of-shareholders>.

Objective

This Investor grievance redressal policy (“Policy”) aims at achieving the below stated objectives:

- i. Fair treatment to the Investor(s) / Shareholder(s) at all times.
- ii. Dealing with complaint(s) / grievance(s) raised by Investor(s) / Shareholder(s) with courtesy and in a timely manner;
- iii. To Keep Investor(s) / Shareholder(s) informed of the process to raise their queries / complaints/ grievances and their rights if they are not satisfied with its resolution; and

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 the provision of prompt and effective services to shareholders and monitoring the dedicated email address of the Company for investor grievances.

Definitions

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

- a. **“Board”** means the Board of Directors of One 97 Communications Limited.
- b. **“Online Dispute Resolution Mechanism”** - Online Dispute Resolution Mechanism as defined in the Master Circular for Online Dispute Resolution SEBI/HO/OIAE/OIAE_IAD-3/P/CIR/2023/195 updated as on December 28, 2023, issued by the Securities and Exchange Board of India ('SEBI') or as amended from time to time."

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.

Classification of Shareholder Communication

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.

The Company receives various correspondence / communication from the investors, either directly or forwarded by the stock exchanges, depositories or uploaded on SCORES "SEBI Complaints Redressal System"), relating to the shares, annual reports, and other ancillary matters. These communications may either be mere queries / requests by the shareholders. The RTA/ Company presently follows a set of guidelines for classifying the shareholders' communication between general correspondence / requests / complaints, etc. The Company has also formulated a set of frequently asked questions (FAQs) in respect of share-related matters for better shareholder awareness. Investors can refer to the same at on the website of the Company at <https://ir.paytm.com/faqs>.

General Principle guiding classification of shareholders' communication.

- a. 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 treated as one correspondence/complaint.
- b. Investors shall first take up their grievances for redressal with the RTA/ Company, through designated officials of the Company / RTA as stated in the Investor Contact details / Escalation matrix in this policy.

Classification of shareholders' communication

	Communication not treated as complaint	Communication treated as complaint
a.	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(s) on or before the due date(s) and intimated the same to the shareholder.</p> <p>Such communication shall be treated as request for an additional copy of the annual report. Company / RTA 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 as mentioned in this policy.
b.	Non-receipt of Dividend, whenever declared	
	<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 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 or unpaid dividend, the Company will proceed for payment of unpaid dividend via electronic bank transfer upon a written request by the shareholder with original cancelled cheque bearing the name of the securities holder or updated CML failing which securities holder shall submit copy of updated bank passbook / latest statement duly attested by bank. Such communication from the shareholder will 	<p>Communication w.r.t. non-receipt of dividend warrants / demand drafts to be treated and recorded as a complaint if:</p> <ul style="list-style-type: none"> ⇒ The Company/ RTA has not paid dividend on or before the due date, or ⇒ The Company/ RTA has not issued duplicate dividend warrant/demand draft after the expiry of the stipulated turnaround time as mentioned in this policy.

	Communication not treated as complaint	Communication treated as complaint
	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 / 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, as mentioned in this policy.</p>
d.	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>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 a complaint, regardless of the nature of such communication, the Company is constrained to follow the 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 a complaint by such authority, will be treated as a complaint by the Company.</p>
e.	Other shareholders request	

	Communication not treated as complaint	Communication treated as complaint
	<p>i. Correspondence w.r.t. change in address, nominee etc. will be considered as a request and not as a complaint if the request is addressed within the stipulated turnaround time.</p> <p>ii. 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>iii. Incomplete communications, communications without requisite supporting documentation or DP ID / Client ID.</p>	<p>Any communication, if not responded to by the Company/RTA within the stipulated turnaround time, as mentioned in this policy, will be considered as complaint.</p>
f.	Other communication	
	<p>i. Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.</p> <p>ii. or any communication which is vague or nonspecific in nature, will not be treated as a complaint.</p> <p>iii. any other request/query/communication for which Company is not statutorily required to respond, will not be treated as complaint under this Policy.</p> <p>iv. Communications / complaints in relation to matters that are sub- judice, will not be treated as a complaint under this Policy</p>	

Stipulated timeline for Investor Services by RTA

The RTA shall follow below timelines for handling communication / grievances of the shareholders:

Nature of Service	Expected Timelines (No. of day) *
Processing of Transmission request for shares in Demat	21
Intimation through letters regarding distribution of corporate benefits (dividend, bonus, stock Split)	30
Processing of dematerialization request	15
Processing of remat request	30
Processing of Transposition request for shares in Demat	15
Annual Report	10
Re-validation of dividend warrants	15
Processing of request for change in / up-dation of:	
Name	30
Signature	30
Nomination	30
Contact details (Address, Email & Mobile number)	15
Bank Account details	15
PAN	15
Grievance	
Providing response to the inquiries of the investors	30
Issuing "Letter of Confirmation" in lieu of physical security certificate for below service requests: (a) Issuing duplicate security certificates; (b) Claim from Unclaimed Suspense Account; (c) Renewal / exchange of securities certificate; (d) Endorsement; (e) Sub-division / Splitting of securities certificate; (f) Consolidation of securities certificates/folios; (g) Transmission; and (h) Transposition	30

The 'Letter of Confirmation' shall be valid for a period of 120 days from the date of its issuance, within which the securities holder/claimant shall make a request to the Depository Participant for dematerializing the said securities.

* If any other timeline/ process is provided under applicable SEBI regulations, circular, master circular, guidelines etc. the Company and RTA shall follow the same while processing the above request/ any other request not mentioned above.

It is to be further noted that:

- a. If any supporting documents are required by the RTA/ Company from the shareholder for addressing any of the aforementioned request such matter will be addressed within the aforementioned timeline from the receipt of such document to the RTA's/ Company's satisfaction.
- b. In case statutory timeline for redressal of any grievance not specifically mentioned here, the Company/ RTA shall address such grievance within the timeline as prescribed under the applicable law.

KYC requirements for shareholders

Shareholders holding the shares in physical form are required to submit and update their PAN, Nomination, Address with PIN Code, E-mail Address, Mobile Number, Bank Account Details, Specimen Signature and Nomination to the RTA/ Company. The required forms have been uploaded on the Website of the Company at: <https://ir.paytm.com/faqs>.

Investor Grievance Redressal Mechanism

- a. Investors can lodge a complaint for non-receipt of investor services within the stipulated timelines mentioned herein above by the RTA, by giving details of their name, folio no., DP ID / Client ID, Email address, Mobile Number, nature and full particulars of their complaint directly to the Company at compliance.officer@paytm.com or at the registered office/ Corporate office of the Company.
- b. The Company shall redress investor grievance promptly but not later than 21 calendar days, or within such time as may be provided by the SEBI, from the receipt of the grievance in such manner as specified by the SEBI.
- c. Only complaints sent to the addresses / email ids mentioned in this Policy will be treated as valid complaints. Email received from the registered email id of shareholder/letter received under the signature of shareholder shall be treated as valid communication/complaint.
- d. In case, the Company fails to redress the complaint within the timeline provided herein, the investor may then file their complaint through SCORES platform of SEBI. In case any complaint is directly received by the Company through SCORES, the Company shall resolve the complaint promptly & not later than 21 days from the date of receipt of complaint and upload the Action taken report ('ATR') on SCORES within 21 days of receipt of the Complaint. The ATR will be automatically routed to the complainant.
- e. Investors are entitled to review their complaints on SCORES as per detailed procedure outlined in relevant SEBI circular which can be accessed on the company's website under shareholders info at <https://ir.paytm.com/>. The complainant in the event of being dissatisfied shall give reasons for not being satisfied with the ATR and provide clear reasons for review at any stage, as mentioned in the SEBI circular SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023, as amended from time to time.
- f. The Investor may also choose to opt remedies through the Online Dispute Resolution mechanism in case they are not satisfied with the disposal on Scores post SEBI review. A detailed process is given in the applicable Master Circular for Online Dispute Resolution SEBI/HO/OIAE/OIAE_IAD-3/P/CIR/2023/195 updated as on December 28, 2023, as amended, from time to time, which is available on the website of the Company at <https://ir.paytm.com/online-dispute-resolution>.

Investor Contact Details and Escalation Matrix

Particulars	Contact details	Address
<u>Level I</u> Registrar & Share Transfer Agent (RTA)	Email: delhi@linkintime.co.in Website: www.linkintime.co.in	Link Intime India Private Limited Noble Heights, 1st Floor, Plot NH 2, C-1 Block LSC, Near Savitri Market, Janakpuri, New Delhi – 110058 Tel. No.: +91 011-49411000
<u>Level II</u> <u>Company</u>	Company Secretary Email: compliance.officer@paytm.com Website: www.paytm.com	One 97 Communications Limited One Skymark, Tower D, Plot No. H-10B, Sector - 98, Noida-201304. Tel. No.: +91 120 4770770
Stock Exchanges		BSE Limited (Scrip Code: 543396) Phiroze, Jeejeebhoy Towers, Dalal Street, Mumbai 400 001 Website: www.bseindia.com National Stock Exchange of India Limited (Symbol: PAYTM) Exchange Plaza, Plot No. C/1, G Block, Bandra-Kurla Complex, Bandra (East), Mumbai 400 051 Website: www.nseindia.com
SEBI SCORES		If Shareholders are not satisfied with the response received from the RTA/Company, they can approach Securities and Exchange Board of India by lodging a grievance SEBI SCORES portal: URL https://scores.sebi.gov.in/
SMART ODR Portal (Securities Market Approach for Resolution Through ODR Portal):		https://smartodr.in/login

The Company periodically obtains status reports of the complaints received, resolved & pending, from the RTA and reports the same to the stock exchanges in compliance of Listing Regulations. The said report is also placed before the Board / Stakeholders Relationship Committee on a quarterly basis.

Policy on maintenance of stationery and other documents

Pursuant to SEBI Master Circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2023/70 for Registrars to an Issue and Share Transfer Agents dated May 17, 2023, the RTA and the Company shall maintain strict control on stationery including blank certificates, dividend/interest/redemption warrants and shall periodically check by physical verification. The reconciliation report shall be maintained by the RTA and the Company.

RTA shall abide by the procedure and process as mandated under SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, as amended, and all other circulars, guidelines as are applicable to the RTAs from time to time.

The RTA shall also submit a copy of the report of the internal audit to the Company within three months from the end of each financial year.

The governing council of the RTA shall consider the report of the internal auditor and take steps to rectify the deficiencies, if any. The RTA shall send the Action Taken Report to the Company within next one month and a copy thereof shall be maintained by the RTA.

Miscellaneous

The Stakeholders Relationship Committee is responsible for the examination and redressal of the complaints by investors and has been vested with the power to amend the Policy from time to time.

In the event of any conflict between the provisions of this Policy and the Companies Act or SEBI Listing Regulations or any other statutory enactments, modification or rules, the provisions of SEBI Listing Regulations / Companies Act or statutory modification, enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to be severed from the Policy and the rest of the Policy shall remain in force.

Any Statutory amendment shall be deemed to be effective from the date of notification thereof.