

**Investor Grievance Redressal Policy**

**Background:**

The Company's Ordinary (Equity) Shares are listed on BSE Limited (BSE) and National Stock Exchange of India Limited (NSE). The Global Depository Receipts (GDRs) of your Company are listed on the Luxembourg Stock Exchange and are also admitted for trading on International Order Book (IOB) of the London Stock Exchange. The Company's privately placed Non-Convertible Debentures (NCDs) are listed on the Debt Segment of BSE. The Company's Ordinary Equity Shares are under compulsory trading in demat form only.

The matters related to transfer of securities of the Company & Shareholders/Investors Grievance and related function of the Company are outsourced to KFin Technologies Pvt. Ltd. ("KFintech"). The Secretarial Department oversees the activities of the Registrar and Transfer Agents to ensure timely transmission and demat of shares and prompt service in investor related matters.

**Objective:**

The objective of the Policy is to promote and build prompt Investor Grievance redressal mechanism and investor friendly relations. The Policy thus recognises the investors' right to always have a contact address available to enable them to query or record a grievance. This also enables the Company use investors' views as a feedback mechanism.

**Grievance Handling Mechanism**

The Company has an established mechanism for investor service and grievance handling, with KFintech and the Compliance Officer appointed by the Company for this purpose, being the important functional nodes.

Some of the key steps undertaken by the Company for handling Investor Grievances are enumerated as follows:

1. The Company has a designated email ID [investors@mahindra.com](mailto:investors@mahindra.com) for handling investor grievances on which investor can send a complaint. This e-mail ID is mentioned on every communication of the Company to the shareholders and is also mentioned on the website of the Company.
2. Executives in the Corporate Secretarial Department access the above-mentioned designated investor grievances e-mail ID on a regular basis to check whether any new complaint or request from securityholders has been received.
3. Full details of the complaint or request are immediately thereafter informed to KFintech.

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4. Corporate Secretarial Department obtains all information available on the complaint or request which is considered necessary for a proper resolution of the grievance. It looks into all the necessary information and undertakes to resolve them as soon as possible.
5. Upon receipt of the necessary documentation and information, and after satisfying the necessary quality checks, the Company follows the practice of resolving the investor complaint or request promptly and as per the service standards established with KFintech .
6. Status Report is obtained periodically from KFintech in respect of various correspondences and complaints received by the Company directly or by KFintech.
7. The Company engages a practicing Company Secretary for carrying out Reconciliation of Share Capital Audit, Audit of delivery of share certificates within the prescribed time limit in pursuance of statutory requirements.
8. The Status of receipt, redressal and pendency of all the complaints are placed before the Stakeholders Relationship Committee and Board.
9. KFintech being the Registrars and Transfer Agents (RTA) of the Company is primarily responsible to resolve the investor's grievances. KFintech is responsible for discharging investor service functions effectively, efficiently and expeditiously.
10. The complaints received through Stock Exchanges are attended immediately.
11. All the investor complaints/grievance received online through "SEBI Complaints Redress System" (Scores) are checked regularly and replied/resolved expeditiously.
12. The Company, in its Annual Report, also reminds the Investors to claim unclaimed dividends.
13. The Company has provided an on-line feedback facility to shareholders to give feedback about various investor services offered by the Company. [Click here](#) to provide feedback.
14. The Company has made available escalation matrix for shareholders to escalate their concern, the details of which are given in the Annexure.

The Company has also constituted the Stakeholders Relationship Committee (SRC) which functions under the Chairmanship of an Independent Director, to examine and redress complaints by shareholders and investors. The SRC 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.

In addition to the above, SRC reviews adherence to the service standards adopted by the Company in respect of services being rendered by the RTA, review of various measures and initiatives taken by the Company for reducing the quantum of unclaimed dividends and ensuring timely receipt of dividend warrants/annual reports/statutory notices by the

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Shareholders of the Company. The SRC is authorised to approve request for transmission of shares and issue of duplicate share certificates.

**Policy Adherence Responsibility:**

The Company Secretary and Compliance Officer to ensure that all mandatory provisions of SEBI Regulations and SEBI Investor Protection Guidelines, etc. are complied with and complaints/grievances from shareholders and investors and those routed through Stock Exchanges or SEBI SCORES or Statutory authority(ies) are resolved/replied appropriately.

The policies formulated will be reviewed periodically to foster more dynamic, open and interactive corporate governance and thereby maximising shareholder value.

### **ESCALATION MATRIX FOR INVESTORS GRIEVANCES**

Mahindra & Mahindra Limited ('M&M') is committed to providing effective and prompt service to its investors. M&M has in place, a designated e-mail address i.e. [investors@mahindra.com](mailto:investors@mahindra.com) for assistance and/or grievance redressal and is closely monitored by the Company Secretary of M&M.

#### **Institutional Investors:**

Institutional Investors may contact the executives mentioned at the following link:

<https://www.mahindra.com/contact-mahindra-group>

The escalation matrix for complaints relating to the Investors of M&M is as provided below:

#### **Level 1 -**

##### **1. KFin**

KFin Technologies Private Limited (formerly known as Karvy Fintech Private Limited)

Unit: Mahindra & Mahindra Limited Selenium, Tower B, Plot No. 31-32, Gachibowli, Financial District, Nanakramguda, Hyderabad, Telangana – 500 032, India. Tel. No. : +91 40 6716 1509 Fax No. : +91 40 2342 0814 Email : <a href="mailto:einward.ris@kfintech.com">einward.ris@kfintech.com</a> Website : <a href="http://www.kfintech.com">www.kfintech.com</a> Toll Free No. : 1800 3094 001	6/8, Ground Floor, Crossley House, Near BSE (Bombay Stock Exchange), Next to Union Bank, Fort, Mumbai - 400001. Tel. No.: +91 22 66235353
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**OR**

##### **2. Executives of the Company at:**

<b>Ms. Vandana Das</b> Manager -Group Secretarial	<b>Ms. Priyanka Dhuri</b> Manager -Group Secretarial
Address: 2 <sup>nd</sup> Floor, Mahindra Towers, Secretarial Department Dr. G.M. Bhosale Marg, Worli, Mumbai - 400018 Phone- 022- 6919 5193 Email - <a href="mailto:Das.vandana@mahindra.com">Das.vandana@mahindra.com</a>	Address: 2 <sup>nd</sup> Floor, Mahindra Towers, Secretarial Department Dr. G.M. Bhosale Marg, Worli, Mumbai – 400018 022- 6919 5201 Email – <a href="mailto:Dhuri.priyanka@mahindra.com">Dhuri.priyanka@mahindra.com</a>

**Level 2 -**

In the event, the grievance(s) are not resolved within 3 working days of its submission along with all requisite documents/information or the investor is not satisfied with the resolution provided, he/ she can forward his/her complaint to the next level of hierarchy.

<b>Mr. Feroze Hosang Baria</b>
General Manager -Group Secretarial
Address:
2 <sup>nd</sup> Floor, Mahindra Towers,
Secretarial Department
Dr. G.M. Bhosale Marg,
Worli, Mumbai - 400018
Phone - 022- 6919 5191
Email- <a href="mailto:BARIA.FEROZE@mahindra.com">BARIA.FEROZE@mahindra.com</a>

**Level 3 -**

In the event, the grievance(s) are not resolved within 5 working days of its submission along with all requisite documents or the investor is not satisfied with the resolution provided, he/ she can forward his/her complaint to the Company Secretary.

<b>Mr. Sailesh Kumar Daga</b>
Company Secretary
Address:
2 <sup>nd</sup> Floor, Mahindra Towers,
Secretarial Department
Dr. G.M. Bhosale Marg,
Worli, Mumbai - 400018
Phone - 022- 6919 5191
Email - <a href="mailto:Daga.sailesh@mahindra.com">Daga.sailesh@mahindra.com</a>

**Level 4 -**

In case of non-redressal of the complaint to the investor's satisfaction within a reasonable time frame, the investor may approach the Chief Financial Officer-

<b>Mr. Amarjyoti Barua</b>
Address:
2 <sup>nd</sup> Floor, Mahindra Towers,
Secretarial Department
Dr. G.M. Bhosale Marg,
Worli, Mumbai - 400018
Phone - 022- 6919 5151
Email - <a href="mailto:Barua.amarjyoti@mahindra.com">Barua.amarjyoti@mahindra.com</a>

**Level 5 -**

In case a complaint is still not redressed to the investor's satisfaction, 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 weblink <http://scores.gov.in>

**Filing complaints on SCORES - Easy & quick**

- a. Register on SCORES portal
- b. Mandatory details for filing complaints on SCORES:
  - i. Name,
  - ii. PAN,
  - iii. Address,
  - iv. Mobile Number,
  - v. E-mail ID
- c. Benefits:
  - i. Effective communication
  - ii. Speedy redressal of the grievances

**Level 6 -**

The Complainant can initiate dispute resolution through the Online Dispute Resolution Portal ("ODR Portal") in case the outcome of the grievance lodged with the above - mentioned level of escalations (i.e. Level 1 to Level 5) is not satisfactory. Further, the Complainant is required to ensure that the grievance lodged through ODR portal is not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law.

ODR portal can be accessed through the weblink <https://smartodr.in/login>

**Address for correspondence with Debenture Trustee:**

Axis Trustee Services Limited

The Ruby, 2<sup>nd</sup> Floor, SW, 29 Senapati Bapat Marg, Dadar West, Mumbai – 400028

Phone: +91-22-62300451

Fax +91-22-62300700

[debenturetrustee@axistrustee.com](mailto:debenturetrustee@axistrustee.com)

**Details of The Nodal Officer for the purpose of co-ordination with the IEPF:**

Mr. Sailesh Kumar Daga

Email ID: [investors@mahindra.com](mailto:investors@mahindra.com)