



DMCC SPECIALITY CHEMICALS LIMITED
(Formerly known as "The Dharamsi Morarji Chemical Company Limited")

INVESTORS' GRIEVANCE REDRESSAL POLICY

Document Controls

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1.0	Secretarial & Legal Function	Board of Directors on the recommendation of the Stakeholders Relationship Committee	09-Feb-2024	Initial Release

INVESTORS' GRIEVANCE REDRESSAL POLICY

1. PREAMBLE AND OBJECTIVE:

The DMCC Speciality Chemicals Limited (Formerly known as The Dharamsi Morarji Chemical Company Limited) ("DMCC/Company") is committed to adhering to the highest standards of investor relations providing efficient services to them and effectively addressing/redressing their grievances in a timely manner.

With this objective, the Company has formulated the Policy on Investors' Grievances Redressal to provide efficient service to the investors and to redress their grievances in a timely manner.

The Board of Directors of the Company has appointed the Company Secretary to act as the Compliance Officer as per the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), as amended from time to time and Nodal Officer under the Companies Act, 2013. The Company Secretary is responsible for providing prompt and effective services to the investors.

Link Intime (India) Private Limited, is the Registrar and Share Transfer Agent ("RTA") of the Company and is primarily responsible for providing prompt and efficient service to the investors and in consultation with the Company, wherever required.

2. INVESTOR CORRESPONDENCE:

The RTA and the Company receive various correspondence from the investors, either directly or forwarded by the Stock Exchanges, Depositories, uploaded on SCORES ("SEBI Complaints Redressal System") or ODR Portal, relating to the securities, annual reports, dividends, and other ancillary matters. These correspondences may either be complaints or queries/requests by the investors.

The Company has well-defined guidelines with respect to the classification of shareholders' communication/grievances, servicing timelines and the process for redressal of grievances and the escalation matrix thereof.

3. GRIEVANCE HANDLING MECHANISM:

The Company has an established mechanism for investor service and grievance handling, with RTA and the Compliance Officer appointed by the Company for this purpose.

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

1. Designated Exclusive Email ID: The Company has designated Email Id investor@dmcc.com exclusively for shareholder/investor communication as well as for grievances redressal. The said email id is regularly monitored by the Secretarial & Legal Function and also by the Company Secretary.

2. Dedicated Relationship Manager (Single Point of Contact) by RTA: RTA has deputed a Relationship Manager who looks after the investor affairs of the Company and the Company interacts with him/her on a regular basis to ensure effective investor services.
3. Insta-Web Premium Access: Though the Company has appointed RTA for investor services, in addition to this, the Company has subscribed to Insta-Web Premium Access facilitated by RTA which has all the shareholder's details in an integrated manner that helps the Company to serve the Shareholder in the best manner as it allows the Company to see each transaction along with scanned documents submitted by the Shareholder and real-time update of information.
4. Comprehensive Communication and Advice to Shareholders: Secretarial & Legal Function 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. The Company also receives direct communication from shareholders by email as well as by telecom and sometimes shareholders visit the office and the Company endeavors to reply to the shareholder in a comprehensive manner.
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 RTA.
6. Senior Citizens Shareholder: The Company helps Senior Citizen shareholders in understanding requirements and complying with the necessary procedure and also helps shareholders who are not tech savvy to fill requisite forms wherever necessary.
7. Co-ordination with RTA: In order to serve shareholder in better manner, the Company Secretary and its staff has regular discussion with RTA so as to have consensus with the process and procedure. RTA is advised to send comprehensive and value added communication to the shareholder to avoid back and forth communication.
8. 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.
9. The Status of receipt, redressal, and pendency of all the complaints are placed before the Stakeholders Relationship Committee.
10. The RTA of the Company is primarily responsible for resolving the investor's grievances. RTA is responsible for discharging investor service functions effectively, efficiently, and expeditiously.
11. The complaints received through Stock Exchanges are attended immediately.
12. All the investor complaints/grievance received online through "SEBI Complaints Redress System" (Scores) are checked regularly and replied/resolved expeditiously.

13. The Company, in its Annual Report, also reminds the Investors to claim unclaimed dividends/ Unclaimed Shares.
14. The Company has also constituted the Stakeholders Relationship Committee (SRC) to examine and redress complaints by shareholders and investors. The SRC investor grievances and also reviews reports shared by RTA w.r.t. shareholders request, Unclaimed Dividend, Unclaimed Deposits, Unclaimed Shares, KYC Update, Dematerialisation Status, review of shares lying in Unclaimed Suspense Account, Suspense Escrow Account. Requests approved by the Company Secretary are placed before the Board of Directors of their next Board meeting and also placed before the SRC. 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, reviews of various measures and initiatives taken by the Company for reducing the quantum of unclaimed dividends and ensuring timely receipt of dividends warrants/annual reports/statutory notices by the Shareholders of the Company.
15. The Company has made available an escalation matrix for shareholders to escalate their concerns, the details of which are given in *Annexure A*

4. GRIEVANCE W.R.T. FIXED DEPOSITS ACCEPTED BY THE COMPANY:

For any communication or grievance or query w.r.t. Fixed Deposits, the Deposit holder/ may communicate to investor@dmcc.com. The said email id is regularly monitored by the Secretarial & Legal Function and also by the Company Secretary.

5. 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.

6. REVIEW AND AMENDMENTS:

This Policy will be reviewed at regular intervals so that it meets the expectations laid down by the Stakeholders Relationship Committee of the Board of Directors of the Company. The Company Secretary is empowered to make changes corresponding to the legislation and the changes if any made shall be placed before the next Board meeting as well as the Stakeholders Relationship Committee.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

Escalation Matrix for Investor's Grievances

A. Escalation Level 1 : Registrar and Share Transfer Agent:

Investors are requested to route their service requests/grievances first to the Company's RTA.

Following are the contact details of RTA:

Link Intime India Private Limited
 C-101, 1st Floor, 247 Park, L.B.S. Marg,
 Vikhroli (West), Mumbai – 400 083
 Tel No.: 022 – 49186270
 Fax: 022 – 49186060
 Email: rnt.helpdesk@linkintime.co.in
 Website: www.linkintime.co.in

B. Escalation Level 2 (Company):

Wherein the grievance(s) of the investors are not resolved within 7 working days of sending the email to RTA/the Company or within required timelines after delivery of all the requisite documents and information or wherein the investor is not satisfied with the resolution provided, he/she/they can refer the grievance(s) to the Company at:

Shares/IEPF Related

Ms. Sakshi Gupta
Assistant Manager-Secretarial & Legal
DMCC Speciality Chemicals Limited
 (Formerly known as The Dharamsi Morarji Chemical Company Limited)
 317 / 21 Prospect Chambers,
 Dr. D N Road, Mumbai, Maharashtra, 400001
 Tel No.: 022-22048881/2/3
 Email: investor@dmcc.com with CC to sgupta@dmcc.com

C. Escalation Level 3 (Company):

Wherein the grievance(s) of the investor is not resolved within the next 5 working days of sending the email to the above executives of the Company or where the investor is not satisfied with the resolution provided, he/she/they can refer the grievance(s) to the Company Secretary of the Company at:

Mr. Omkar Chandrakant Mhamunkar
Company Secretary & Compliance Officer & Nodal Office for IEPF
DMCC Speciality Chemicals Limited
 (Formerly known as The Dharamsi Morarji Chemical Company Limited)
 317 / 21 Prospect Chambers,
 Dr. D N Road, Mumbai, Maharashtra, 400001
 Tel No.: 022-22048881/2/3
 Email: investor@dmcc.com with CC to omhamunkar@dmcc.com

D. Escalation Level 4 : SEBI SCORES Platform:

In case if the grievance(s) of the investors are still not resolved 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.

Investors who wish to lodge a Complaint on SCORES are required to register themselves on www.scores.gov.in by clicking on "Register here" under the "Investor Corner". While filing the registration form, details like the Name of the investor, Permanent Account Number (PAN), contact details, and email id, are required to be provided for effective communication and speedy redressal of the grievances. Upon successful registration, a unique user id and a password shall be generated and communicated through an acknowledgment email to the complainant.

Investors are advised to refer to the relevant SEBI Circular to understand the SEBI-prescribed framework for the redressal of investor grievances.

E. Escalation Level 5: Online Dispute Resolution Portal:

SEBI through its Master Circular on the resolution of disputes has streamlined the dispute resolution mechanism in the Indian securities market under the aegis of Stock Exchanges and Depositories by expanding their scope and by establishing a common Online Dispute Resolution Portal ("ODR Portal") which harnesses online conciliation and online arbitration for resolution of disputes arising in the Indian Securities Market.

Accordingly, in cases where investors raise issues, that require adjudication on any third party rights, on questions of law or fact or which is in the nature of a law between parties, or if investors are not satisfied with the outcome of complaints filed on SCORES platform post SEBI review, they can initiate dispute resolution through the ODR portal within the prescribed timeline.

The details for Online Dispute Resolution is given in the following link:

https://www.dmcc.com/Media/pdf/Dispute-Resolution_Online-ODR_DMCC.pdf