## MAHINDRA & MAHINDRA FINANCIAL SERVICES LIMITED

## **INVESTOR GRIEVANCE REDRESSAL POLICY**

Name of Document	Investor Grievance Redressal Policy
Version	1.0
Policy/Code/Manual/ Guideline	Policy
Issuing Authority	Board of Directors
Policy Owner and adherence responsibility	Company Secretary
Issue Date	23-04-2024
Effective Date	23-04-2024
Last amended	Not Applicable
Review Periodicity	This Policy shall be subject to review once in every three years or as may be deemed necessary, whichever is earlier.
Version History	Version 1.0 Issued on 23-04-2024 effective 23-04-2024, to provide escalation matrix to investors for redressal of complaints.

## MAHINDRA & MAHINDRA FINANCIAL SERVICES LIMITED

## **INVESTOR GRIEVANCE REDRESSAL POLICY**

## I. Background:

The equity shares of Mahindra & Mahindra Financial Services Limited ("the Company"/ "MMFSL") are listed on BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE"). The Company's Non-Convertible Debentures ("NCDs") are listed on the Debt Segment of BSE.

The matters related to equity shares and NCDs ("securities") & resolution of grievance(s) of equity holders and NCD holders ("investors") of the Company are serviced by KFin Technologies Limited ("KFintech"), the Registrar and Transfer Agent ("RTA") of the Company. The Secretarial Department of the Company oversees the activities of KFintech to ensure timely and prompt services in investor related matters.

## II. Objective:

This Policy is being adopted on a voluntary basis, from good governance perspective.

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

## III. Grievances Handling Mechanism:

The Company has an established mechanism for providing investor services and grievance handling, with KFintech .

As per regulation 13(1) of Listing Regulations, as amended, the Company shall redress investor grievances promptly but not later than twenty-one calendar days from the date of receipt of the grievance and in such manner as may be specified by SEBI.

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

- 1. The Company has designated email ID's viz <a href="investorhelpline\_mmfsl@mahindra.com">investorhelpline@mahindra.com</a> (for NCD holders) 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 investors 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 security holders has been received.
- 3. Full details of the complaint or request are within 2 working days thereafter informed to KFintech.
- 4. KFintech obtains all information 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 and complete 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. The timeline for redressal will be deemed to be initiated from the date of receipt of complete documents, as required for the purpose of resolution.
- 7. Status Report is obtained periodically (weekly/fortnightly) from KFintech in respect of various correspondences and complaints received by the Company directly or by KFintech.
- 8. The Company engages a practicing Company Secretary for carrying out Reconciliation of Share Capital Audit 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 and Board on quarterly basis.
- 10. KFintech being the 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.
- 11. The complaints received through Stock Exchanges are attended expeditiously by the Company/RTA.
- 12. All the investor complaints/grievance received online through "SEBI Complaints Redress System" (SCORES) and SMART ODR Portal are checked regularly and replied/resolved by the Company/RTA.
- 13. The Company, via its Annual Report and other communications and letters also reminds the Investors to claim unclaimed dividends/ unclaimed amounts.
- 14. The Company has provided an on-line feedback facility to investors to give feedback about various investor services offered by the Company. <u>Click here</u> to provide feedback.
- 15. The Company has made available escalation matrix for investors to escalate their concerns, the details of which are given in the Annexure to this Policy.

The Company has also constituted a Stakeholders Relationship Committee ("SRC") which functions under the Chairmanship of an Independent Director, to examine and redress complaints by investors. The SRC meets as often as required to resolve investor grievances including complaints related to transmission of shares/debentures, non-receipt of annual report, non-receipt of declared dividends/interest/redemption amounts, 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 shareholders of the Company. The SRC is authorised to approve request for transmission of shares/debentures.

#### IV. Amendments:

The Board may approve amendments to the said Policy, from time to time. The Policy owner is authorised to make any updations in the names/ contact details of RTA/ Company officials as stated in the Annexure without any approval of the Board.

## V. Scope and Limitation:

The Securities and Exchange Board of India ("SEBI") (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Listing Regulations"), Circulars issued by SEBI in this regard, or any other statutory enactments, laws, etc., as amended from time to time and applicable to the Company, shall prevail and will be complied even if the said statutory provisions/ amendments are not specifically incorporated in this Policy.

In the event of any conflict between the provisions of this Policy and the Listing Regulations or any other statutory enactments, laws, the stricter provisions compliant with the law shall prevail.

## VI. Disclosures:

This policy shall be hosted on the Company's website.

\*\*\*\*

## **Annexure to the Investor Grievance Redressal Policy**

# <u>ESCALATION MATRIX FOR INVESTORS GRIEVANCES</u> (Applicable to Equity shareholders and Non-convertible Debentures)

The Company is committed to providing effective and prompt service to its investors. It has in place, designated e-mail addresses as under:

- investorhelpline mmfsl@mahindra.com (for equity holders) and
- <u>mmfsl.debenturehelpline@mahindra.com</u> (for Non- Convertible Debenture / "NCD" holders, for NCDs issued via Public/ private placement)

for assistance and/or grievance redressal.

## **Institutional Investors:**

Institutional Investors may contact the Investor Relations Head – Sandesh Naik, Assistant SVP – Financial Planning and Analysis – Core Business, at <a href="mailto:naik.sandesh@mahindra.com">naik.sandesh@mahindra.com</a>

## **Institutional and Retail Investors:**

Institutional and Retail Investors ("Investors") shall be required to submit all valid documents/information with respect to their grievance to the Officials as under:

#### Level 1:

## **KFin Technologies Limited**

Equity Shares:	Non-convertible Debentures:	
Unit: Mahindra & Mahindra Financial Services	Unit: Mahindra & Mahindra Financial Services	
Limited	Limited – NCDs	
Attn : Mr. Suresh Babu	Attn : Mr. Umesh	
Address: Selenium Building, Tower B, Plot Nos. 31-32, Financial		
District, Nanakramguda, Gachibowli, Serilingampally Mandal,		
Hyderabad – 500 032, Telangana, India.		
Tel.: +91 40 6716 2222/1800 309 4001		
Fax: +91 40 2300 1153		
Email: einward.ris@kfintech.com		
Website: www.kfintech.com		

## OR to

## **Executives of the Company**

Equity Shares:	Non-convertible Debentures:
Ms. Richa Parekh	Mr. Akash Jash
Manager – Secretarial	Manager - Treasury
Mahindra & Mahindra Financial Services	Mahindra & Mahindra Financial Services Limited,
Limited (Corporate Office)	Agastya Corporate Park Piramal, Amiti Building,
4 <sup>th</sup> Floor, Mahindra Towers,	3 <sup>rd</sup> Floor, B Wing, Sunder Bung Lane, Kamani Junction,
Secretarial Department	Kurla West, Mumbai, Maharashtra – 400 070
P. K. Kurne Chowk, Worli,	Tel.: +022 6652 3531
Mumbai – 400 018	Email ID: <a href="mailto:mmfsl.debenturehelpline@mahindra.com">mmfsl.debenturehelpline@mahindra.com</a>
Tel.: + 91 22 6652 6000	/ jash.akash@mahindra.com
Email ID:	
investorhelpline_mmfsl@mahindra.com/	
parekh.richa@mahindra.com	

Investors shall be required to submit all valid documents/information with respect to their grievance to the Officials as per the escalation matrix given under:

## Level 2:

In the event, the grievance(s) are not resolved within 5 working days of its submission or the investor is not satisfied with the resolution provided, he/ she can forward his/her complaint to the next level of hierarchy:

Equity Shares:	Non-convertible Debentures:
Ms. Mansi Laheri	Mr. Swapnil Dahasahasra
Vice President – Secretarial	Assistant Vice President - Treasury
4 <sup>th</sup> Floor, Mahindra Towers,	Mahindra & Mahindra Financial Services Limited,
Secretarial Department	Agastya Corporate Park Piramal, Amiti Building,
P. K. Kurne Chowk, Worli,	3 <sup>rd</sup> Floor, B Wing, Sunder Bung Lane, Kamani Junction,
Mumbai – 400 018	Kurla West, Mumbai, Maharashtra - 400070
Tel.: +022 6652 6000	Tel.: +022 6652 3531
Email ID: <u>laheri.mansi@mahindra.com</u>	Email ID: dahasahasra.swapnil@mahindra.com

## Level 3:

In the event, the grievance(s) are not resolved within 7 working days of its submission or the investor is not satisfied with the resolution provided, he/ she can forward his/her complaint to the next level of hierarchy:

## For Equity Shares and Non-convertible Debentures:

Ms. Brijbala Batwal Company Secretary

4<sup>th</sup> Floor, Mahindra Towers,

P. K. Kurne Chowk, Worli,

Mumbai – 400 018 Tel.: +022 6652 6000

Email ID: batwal.brijbala@mahindra.com

## 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:

## For Equity Shares and Non-convertible Debentures:

Mr. Vivek Karve

**Chief Financial Officer** 

4<sup>th</sup> Floor, Mahindra Towers,

P. K. Kurne Chowk, Worli,

Mumbai – 400 018 Tel.: +022 6652 6000

Email ID: karve.vivek@mahindra.com

#### Level 5:

In case a complaint is 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 provides for effective communication and speedy redressal of grievances and can be accessed through the weblink: https://scores.sebi.gov.in

Details like Name, PAN, Date of Birth, Address, Mobile Number and E-mail ID are mandatory for filing complaints on SCORES.

### Level 6:

After exhausting the above options for resolution of the grievance, if the investor is still not satisfied with the outcome, he/she/they can initiate dispute resolution through the Online Dispute Redressal Portal at the weblink: <a href="https://smartodr.in/">https://smartodr.in/</a>.

SMART ODR harnesses online conciliation and online arbitration for resolution of disputes.

## **Contact details of Debenture Trustee (Debenture related matters):**

#### **Axis Trustee Services Limited**

Corporate Office: The Ruby, 2nd Floor, SW, 29 Senapati Bapat Marg, Dadar (West),

Mumbai - 400 028. Tel.: +022 6230 0451 Fax: +022 4325 3000

Email ID: debenturetrustee@axistrustee.co.in

Contact details for IEPF (Investor Education & Protection Fund)/ matters relating to unclaimed dividends/interest/redemption payments on NCDs:

## **Nodal Officer:**

Ms. Brijbala Batwal **Company Secretary** 

Email ID: batwal.brijbala@mahindra.com

## **Deputy Nodal Officer (Equity):**

Ms. Richa Parekh Manager - Secretarial

## **Deputy Nodal Officer (NCDs):**

Mr. Swapnil Dahasahasra

Assistant Vice President - Treasury

Email ID: <a href="mailto:parekh.richa@mahindra.com">parekh.richa@mahindra.com</a> Email ID: <a href="mailto:dahasahasra.swapnil@mahindra.com">dahasahasra.swapnil@mahindra.com</a>