NUPUR RECYCLERS LIMITED

INVESTOR GRIEVANCE REDRESSAL POLICY

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1. OBJECTIVE

The objective of this Investor Grievance Redressal Policy ('Policy') is to promote Investor Grievance redressal mechanism and investor friendly measures. The Policy thus outlines the Company's existing framework for handling investor concerns, complaints, or grievances with the focus on resolving them fairly and expeditiously.

The Board of Directors of the Company have 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") and Nodal Officer under the Companies Act, 2013.

The Company has appointed M/s Skyline Financial Services Private Limited as its Registrar and Share Transfer Agent ('RTA'), who is primarily responsible for handling investors related matters by providing prompt and efficient service in consultation with the Company wherever required.

2. INVESTOR CORRESPONDENCE

The RTA and the Company receive various correspondences from investors, either directly or through Stock Exchanges. Upon listing, the Company will also be accessible through SCORES (SEBI Complaints Redressal System), enabling investors to file complaints related to shares, annual reports, dividends, and other matters. These correspondences typically comprise queries, requests, or complaints from investors.

3. INVESTOR SERVICE TIMELINES

The Company and its RTA follows the below timeframe for performance of their respective duties towards the investors:

a. Requests for change of address, non-receipt of annual reports, notice of general meetings, update in bank details (for holdings in physical form) are addressed by the RTA within a period of 7 (seven) working days from the receipt of the request.

b. Requests other than those referred in point (a) above, including but not limited to transmission/ duplicate share certificate, change of name, dematerialization, and loss of share certificates, etc. are addressed by the RTA within 15-30 days. In case, any supporting documents are required by the RTA for addressing the request, such matters will be addressed within a period of 30 days from the receipt of such documents to the RTA' s satisfaction.

**Demat requests processed within 15 days*

c. Requests 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 law.

4. GENERAL MANNER OF CLASSIFICATION OF INVESTOR COMMUNICATION

a. Multiple correspondences / communications or reminders received for the same matter within the specified timelines will be treated as one complaint for the purpose of handling the request/grievance.

b. If an investor expresses his/her unwillingness to provide any document, or dissatisfaction over the rejection of a particular document or any other matter which is required either as per law or as per Company's/RTA's Standard Operating Procedures, then the same will not be treated as a complaint.

c. In case of any ambiguity, the Company Secretary or in his/her absence, the Managing Director shall have the authority to decide on the nature and classification of the communication and the decision of the Company Secretary shall be final and binding.

Classification of shareholders' communication:

Sr. No.	Communication not treated as complaint	Communication treated as complaint
a.	Non-receipt of annual report	
	First request or any such communication with respect to 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(s) through permissible means. Such communication shall be treated as request for an additional copy of the annual report. The 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.	Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if, ➢ the Company / RTA has not dispatched the annual report to the shareholder on or before the due date(s), or ➢ the Company / RTA has not responded to shareholder's request within the stipulated turnaround time.
b.	Non receipt of dividend	
	First request or any such communication with respect to 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). When the Company is unable to pay out the dividend: ➢ In case of shareholders holding shares in demat mode where the	Any communication with respect to non-receipt of dividend warrants / demand drafts sent to the Company or to the RTA after the expiry of the stipulated turnaround time for payment of dividend will be considered as complaint, subject to all the requisite details being available with the Company/RTA.

	dividend is to be credited to the bank account of the shareholder, and such credit has been declined by the bank or where the bank details are not updated with Depository Participants, the Company will pay out the dividend through a demand draft in favor of the shareholder. ➢ In case the dispatched demand draft is returned undelivered, the Company will credit the unclaimed dividends to the bank account of the shareholder only upon a written request. Such communication from the shareholder will be treated as a request and not a complaint.	
c.	Shareholder communication through statutory authorities	
	Any communication from investors through statutory authorities which: ➢ 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.	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. However, since the statutory authorities treat all communication received from investors as complaint, regardless of the nature of such communication, the Company is constrained to follow the classification as followed by the statutory authorities. 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.

d.	Others	
	i. Correspondence w.r.t. change in address, nominees etc. will be considered as a request and not as 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 supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a complaint. v Communications / complaints in relation to matters that are sub-judice will not be treated as a complaint under this Policy.	Any communication from the investor not responded to by the Company or not responded by the Company within the stipulated turnaround time will be considered as complaint.

5. INVESTOR GRIEVANCE REDRESSAL MECHANISM

a) RTA is primarily responsible for managing the share related matters of the Company and resolving their grievances. The designated email address of RTA for the said purpose is grievances@skylinerta.com.

b) The Company has a designated email address i.e. compliance@nupurrecyclers.com for assistance and redressal of the grievance(s) of the investors and the same is monitored by the Corporate Secretarial Department of the Company on regular basis to ensure a timely redressal. The designated email id is also displayed on the Company's website.

c) The investors can lodge their request or grievance by giving details such as name, folio no., DP ID / Client ID, nature of the request or grievance, directly to the RTA or the Compliance Officer at the email ids mentioned above. including for matters relating to shares / dividend transferred to Investor Education and Protection Fund (IEPF). Further, supporting documentation required for redressal of the complaint shall be informed to the investors by the RTA. The investors are requested to furnish all the requisite information along with duly executed documents at the earliest to avoid any delay in redressal of their grievance.

d) 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.

e) All the investor complaints/grievances, received through Stock Exchanges, Depositories, SCORES, Online Dispute Resolution (ODR) Portal, or any other regulatory authorities, etc. shall be attended and resolved by the Company expeditiously within the stipulated timeframe.

f) For the request / complaint to be addressed in a timely and efficient manner it is advisable to lodge the same through the means specified in this policy.

g) The Company files with the Stock Exchanges and places the statement of investor complaints at the Board meeting on a quarterly basis. Further, the Company also makes annual disclosure of the statement of investor complaints in its annual report pursuant to the Listing Regulations.

h) The Company has appointed Nodal Officer and Deputy Nodal Officer to deal with requests from shareholders for claiming their shares / dividend from IEPF authority.

i) The Company places the Report along with the action taken report on the observations, if any, at the meeting of the Stakeholders' Relationship Committee (SRC) and the Board of Directors as required under applicable Listing Regulations.

j) The SRC inter alia reviews the following on an annual basis:

- quantum of complaints received, responded and pending
- measures taken by the Company for effective exercise of voting rights by investors, reducing the quantum of unclaimed dividends and ensuring timely receipt of dividend warrants/annual reports/statutory notices by the investors.

In addition, the SRC also evaluates the measures taken by the Company to promote investor welfare and enhance their engagement.

6. INVESTORS' GRIEVANCE CONTACT AND ESCALATION MATRIX DETAILS

Level 1

a. Registrar and Share Transfer Agent:

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

Skyline Financial Services Private Ltd.
(Registrar and Share Transfer Agent)

Add.: D-153 A, 1st Floor, Okhla Industrial Area, Phase-I, New Delhi - 110 020
Toll free number: + 91 - 11 - 40450193-97
Email: grievances@skylinerta.com, admin@skylinerta.com

Level 2

b. Contact details of the Company Secretary, Compliance Officer and Nodal Officer:

In case a query or grievance remains unresolved post correspondence with the RTA, the investors may contact the Company, as per details mentioned below:

Shilpa Verma
Company Secretary and Compliance Officer
Nodal officer

Nupur Recyclers Limited
Add.: Plot No. 5, G/F,KH No. 12/8 & 12/9KH-12, Arjun Gali New Mandoli Industrial Area, North East, Near Shri Ram Bal Bharti Public School, Delhi, India, 110093
Phone No. 8882704751
Email: compliance@nupurrecyclers.com

Level 3

c. SCORES platform

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 at https://scores.sebi.gov.in/.

d. Online Dispute Resolution (ODR) Portal

In cases where investors are not satisfied with outcome of complaints filed on SCORES platform, they can initiate dispute resolution through the ODR portal within the prescribed timeline. The dispute resolution through the ODR portal can be initiated only if such complaint is not pending before any arbitral process, Court, Tribunal, or Consumer Forum or if the same is non-arbitrable under Indian law.

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

7. MISCELLANEOUS

This Policy has been adopted by the Stakeholders Relationship Committee and the Board of Directors of the Company. The Company Secretary is authorized to amend the Policy to give effect to any changes /amendments notified by the Ministry of Corporate Affairs or the Securities and Exchange Board of India (SEBI) from time to time.

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REVISION HISTORY

Version No.	Reviewed by	Approved by	Release Date
1	Company Secretary & Compliance Officer	Board of Directors	06.10.2021
2	Company Secretary & Compliance Officer	Board of Directors	10.08.2023