

NOVARTIS INDIA LIMITED

INVESTOR SERVICING AND GRIEVANCE REDRESSAL POLICY

1. BACKGROUND

The equity shares of Novartis India Limited (“the Company / Novartis”) are listed and traded on BSE Limited. Pursuant to the provisions of various statutes, the investors of the Company enjoy several rights, which inter- alia include (i) dematerialization of their security certificates (ii) transmission, transposition of shares, (iii) receiving dividends and other entitlements declared by the Company, (iv) receiving annual reports, general meeting notice and such other prescribed communications, (v) any and all rights available to investors generally, under applicable laws.

To provide efficient services to the investors and to effectively address and redress their grievances in a timely manner, the Company has adopted this Investor Servicing and Grievance Redressal Policy (“the Policy”).

This policy shall come into force with effect from May 10, 2023.

2. PROCESS FOR RESOLVING COMPLAINTS AND QUERIES

With an objective to ensure hassle free and transparent process for resolving queries of shareholders, we have rolled out this framework. This will ensure timely and informed resolution for all our stakeholders.

2.1. As a part of this framework, key initiatives adopted for efficient investor servicing are as follows:

- 2.1.1. 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”) and as Nodal Officer of the Company under the Investor Education and Protection Fund rules (“IEPF rules”). As a Compliance Officer, the Company Secretary is responsible for ensuring compliance of all relevant provisions under Companies Act, 2013 (“the Act”), Listing Regulations, applicable law(s) and for effective services to investors, besides monitoring the dedicated email address of the Company for investor grievances.
- 2.1.2. Link Intime India Pvt. Ltd (“RTA”), Registrar and Share Transfer Agent, has been appointed by us to ensure faster and efficient services to its investors. The RTA is responsible for handling all investors related affairs of the Company.
- 2.1.3. The Company has also constituted a Stakeholders Relationship Committee (“SRC”) which functions under the Chairmanship of Non-Executive Director, to examine and redress complaints by investors. The SRC meets as often as required to inter-alia review the process of investor grievances, including complaints related to transmission of shares, non-receipt of annual report, non-receipt of declared dividends and issue of new/duplicate certificates etc.
- 2.1.4. The SRC also reviews measures taken by the Company for effective exercise of voting rights by investors. 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 various measures and initiatives taken by the Company towards reducing the quantum of unclaimed dividends and physical shares, and also monitors timely receipt of dividend warrants/annual reports/statutory notices by investors of the Company.

2.2. **For processing of service request, investors should follow below stated procedure:**

2.2.1. **Timelines:** Company has laid down timelines, for processing various requests and redressing grievances of investors. The same is enclosed as **Annexure A**. The timelines shall be counted from the date of receipt of the complete set of information / documents from an investor. In case of changes in statutory timelines and timelines mentioned in **Annexure A**, statutory timelines shall prevail.

2.2.2. **Prescribed Forms:** Investor shall submit their service request in the requisite forms, as applicable and as prescribed by the regulatory authority(ies). The requisite forms are available on the Company's website, under the Investor section and enclosed as **Annexure B**. Investors shall duly fill the prescribed forms and forward their service request, along with the requisite self-attested and dated or e-signed documents as prescribed under each form to the RTA. The investor whose email id/KYC is not updated with the Company/RTA should ensure that he submits all the KYC documents first so as to enable the Company to accept the requests through email id of investors.

2.2.3. **Plain paper requests:** If no specific form has been prescribed, the request may be made on a plain paper / from registered email to the RTA.

2.2.4. **Mandatory details to be provided in request:** In all communications, investor should provide their complete shareholding details viz. folio no /DP ID, Client ID, contact number / mobile number and email address. If the investor does not provide the requisite mandatory information to enable the Company / RTA to address the requisition, the investor communication shall be treated as incomplete requisition and shall be liable to be rejected/ discarded.

2.2.5. **Request on designated email id/address:** Only those requests that are sent on the addresses / Email IDs mentioned in the Policy (under Contact details section), shall be treated as valid service request(s) under the Policy.

2.2.6. **For investor holding shares in dematerialized form:** All service requests pertaining to updation of KYC, nomination, bank accounts details, contact details etc. are required to be submitted to their respective depository participant. However, wherever permissible, the Company may take their email ID and mobile number on record for future correspondence / communication, with such investor.

2.2.7. Except for matters relating to shares / dividend transferred to IEPF, investors should send all their requests directly to RTA. For IEPF related matters, investors should contact the Nodal Officer directly, at the contacts specified under the Contact Details section of this Policy.

2.3. **Escalation matrix and process safeguards:**

2.3.1. If an investor does not receive reply / satisfactory response within the timelines stipulated in the Policy from RTA, investor may escalate the matter to the Compliance Officer, by email or postal letter specified under the Contact Details section of the Policy. In case of failure to respond to the query by Company and RTA, the investor can reach out to stock exchanges or SEBI.

2.3.2. As per SEBI circular no SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2022/76 dated 30th May 2023 (which can be accessed by [clicking here](#)), investor can also opt for arbitration. **Please note that arbitration mechanism shall only be opted after utilizing all the options available to the investors.**

2.3.3. While dealing with the investors service requests / complaints, RTA and Company shall abide by the statutory provisions, processes and guidelines, prescribed under applicable laws, the rules and regulations made thereunder and the circulars and notifications issued thereunder.

- 2.3.4. The Company is committed to ensure data privacy of investors. Unless contractually obligated or statutorily required, Company will not share private data of any investor with any third party, without the prior approval of the respective investor.

3. CATEGORIZATION OF INVESTOR REQUIREMENTS

Subject to clause 2.2, investor communications shall be classified into 'Service Request / General Communication' and 'Investor Complaints', as per the following principles:

3.1. Service Requests /General Communication

- 3.1.1. Communication from investors shall be classified as 'Service Requests /General Communication', if it satisfies the following parameters:

3.1.1.1. Communication from an investor received through statutory authorities viz. stock exchanges, Registrar of Companies, Regional Directors, SEBI, etc. which:

3.1.1.2. is not treated as a complaint by the statutory authority(ies); and

3.1.1.3. 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.

3.1.2. Communication from an investor pertaining to processes specified under 'Investor Servicing Timeline' shall be considered as a request, if the RTA / Company has adhered to the timeline(s) for completing the process or has responded to the investor on or before the due date, with the requisition for necessary information / document(s) as may be required to process the request.

3.1.3. Any communication / suggestions / enquiry about procedures for any action by the RTA/Company, shall be considered as a service request / general enquiry and not a complaint. Incomplete communications, communications without requisite supporting documentation, or any communication which is vague or non-specific in nature, shall not be treated as a complaint.

3.1.4. Communications in relation to matters that are sub-judice, shall not be treated as a complaint under the Policy.

3.1.5. Enquiries like history of acquisitions, holding, dividend may take more than the stipulated timelines, in such cases the RTA/Company shall communicate the timelines within which such requests can be adhered to. Such requests/enquiries shall not be treated as complaints even if it is beyond the timelines.

3.2. Investor Complaints

Communications from investors, shall be treated as complaints in the following situations:

3.2.1. Any communication from an investor received through statutory authorities viz. stock exchanges, Registrar of Companies, Regional Directors and SEBI, etc. which is treated as complaint by such statutory authority(ies), shall be treated as a complaint by the Company.

3.2.2. Any communication from an investor which is not responded to, within the stipulated or the extended timelines by the regulatory authorities, shall be considered as a complaint.

3.3. Other general principles guiding classification of investor communication

3.3.1. In case multiple correspondence / communications / reminders are received for the same matter and query is not resolved within the timelines, it shall be treated as one complaint.

3.3.2. Similarly, a consolidated correspondence/ communication/ received from same investor having different folio and the query is not resolved within the timelines, it shall be treated as one complaint.

- 3.3.3. If investor approaches multiple statutory authorities with same / similar query during a quarter, the same shall be treated as separate complaints from such investor, for the purpose of regulatory filings during the quarter.

In case of any ambiguity, the Compliance Officer shall be the sole authority to decide on the nature and classification of the communication, and the decision of the Compliance Officer in this regard, shall be final and binding.

4. CONTACT US

Purpose	Contact details
For share related matters	Link Intime India Pvt. Ltd. Name: Mahesh Masurkar Email : rnt.helpdesk@linkintime.co.in Phone No: (0) 810 811 6767 Address : C-101, 247 Park, L.B.S Marg, Vikhroli (West), Mumbai - 400083
For IEPF related matters	Novartis India Limited Name: Nikhil Malpani Designation: Company Secretary & Compliance Officer Email: india.investors@novartis.com Phone no: +91 22 5024 3000 Address: Inspire BKC Part of 601 & 701 Bandra Kurla Complex Bandra (East) Mumbai – 400 051

5. MISCELLANEOUS

- 5.1. Any words / terms used in the Policy but not defined herein, shall have the meaning ascribed to such term in the Articles of Association of the Company, the Act and the rules made thereunder, the SEBI Act read with the rules and regulations made thereunder, and any other relevant legislation / law applicable to the Company.
- 5.2. In the event of a conflict between the terms of the Policy and any rule, regulation or standard, the provisions of such rule, regulation or standard shall prevail over this Policy, to the extent of such inconsistency.
- 5.3. In the event of a dispute or difference in opinion on the meaning/interpretation of any provision in the Policy, the matter shall be referred to the Compliance Officer, and the decision of the Compliance Officer shall be final and binding, in this regard. In interpreting any term / provision of the Policy, the Compliance Officer may in his discretion, seek the help of the management of the Company or an outside expert, as he deems fit.
- 5.4. The SRC shall review the Policy at **least once in three years**, or as may be otherwise prescribed by the SRC / Board of Directors, from time to time. This Policy may be modified, withdrawn or suspended by the Company, in its sole discretion and without any prior intimation.

Annexure A

The Company and RTA shall follow the below mentioned timelines for the specified requests /process:

Nature of request / process	Stipulated Turnaround Time
Request for copy of the Annual Report	15 days
Processing Demat and Transposition request	
Change in / up-dation of contact details (address, e-mail, and mobile number), bank account details and PAN	
Re-validation of dividend warrants and sending the remittance request files to the bank	
E-mail intimation regarding distribution of corporate benefits (dividend, bonus, stock split)	
Processing Transmission request	21 days
Processing Remat request	30 days
Issuing "Letter of Confirmation" in lieu of physical security certificate for below service requests: <ul style="list-style-type: none"> (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. 	
Intimation through letters regarding distribution of corporate benefits (dividend, bonus, stock Split)	
Change in / up-dation of name, signature and nomination	
Response to inquiries and communication, other than the categories listed above	
