

# Freedom Registry Limited

## INVESTOR CHARTER – REGISTRARS TO AN ISSUE AND SHARE TRANSFER AGENTS (RTAs)

### Vision

To be a trusted, transparent and prompt service provider to the investors, conforming to the highest standards of compliance, confidentiality and professionalism in conduct, to meet the obligation towards investors in Indian capital markets.

### Mission

- To maintain high standard of integrity in the conduct of business by fulfilling obligations in a prompt, ethical, transparent and professional manner.
- To comply with all regulatory requirements in a time bound manner.
- To facilitate prompt service to investors by and through streamlining the process and harnessing technology.
- To facilitate easy approach, communication and interface with investors so as to resolve their queries / grievances.
- To ensure confidentiality of information shared by investors unless such information is required to be provided in furtherance of discharging legal obligations or investors have provided specific consent to share such information.

### Services provided by RTA to investors

- Providing details of allotment and clarification on allotment.
- Processing change in /update of the KYC details of the investors for physical holdings like change of address/bank account details/ e-mail address /telephone/mobile/ nomination and PAN.
- Processing and updating investor holding/title change requests viz., name deletion, transmission, transposition, issue of duplicate shares, dematerialization and rematerialisation of securities.
- Processing of other requests, viz., recording of declaration with regard to exemption / lower tax rates for TDS on dividend/interest, revalidation and reissue of dividend and interest instruments.

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- Processing investor service requests in a timely manner and providing details of discrepancies observed in the documents to the investors in one go.
- Execution and intimation of other corporate actions viz., ESOPs, Dividend payment, Stock split, Bonus issue and Merger/Demerger activities.
- Communication of Rights issue entitlements.
- Communication of Buyback, exit offer, takeover made by the company/ acquirer, and the procedure to be followed by investor in respect of these issues
- Mandatory execution of transfer of shares and dividends to IEPF and transfer of undelivered share certificates to Suspense account.
- Process grievance received through e-mails, Letters and SCORES.

## Timelines pertaining to various services provided by RTA

Sr No	Nature of Service	Expected Timelines (number of days)
<b>A</b>	<b>Investor Service Request:</b>	
1	Processing of transmission request	21
2	Processing of issue of duplicate security certificate request	30
3	Processing of dematerialization request	15
4	Processing of remat request	30
5	Processing of Transposition request	15
6	I. Processing of request for change in / updation of	
	a. Name	30
	b. Signature	30
	c. Nomination	30
	d. Contact details (Address, E-mail address and Mobile number)	15
	e. Bank account details	15
	II. Processing of request for Updation of PAN	15

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7	Processing of Re-validation of dividend / interest / redemption instruments and sending the remittance request files to the bank / Company	15
<b>B</b>	<b>Grievance Redressal</b>	
1	Providing response to the inquiries of the investors and Redressal of Grievance	21
<b>C</b>	<b>Other Operational activities</b>	
1	Allotment of securities (IPO)	6
2	Intimation regarding distribution of corporate benefits (dividend, bonus, stock Split)	
	a. E-mail communication	15
	b. Physical communication	30

## **Rights of investors**

- Right to receive all the benefits/ material information declared by the Company.
- Right to fair and equitable treatment.
- Right to actively participate in the AGM / EGM of the company & E-voting events so as to be a part of the decision making of the Company's business resolutions.
- Right to approach RTA, Depository, Company, Stock Exchange or SEBI for resolution within prescribed timelines, in case of any grievances.
- Right to ask for and receive information about all the statutory and regulatory disclosures.
- Right to sell/transfer securities with minimal documentation.
- Right to get access to services in a suitable manner even if differently abled.
- Right to get access to educational materials of RTAs.
- Right to get customised services as per requirement at fair price.
- Right to have access to the escalation matrix for communication with the RTA.
- Right to not be bound by any clause prescribed by the Issuer Company/RTA which are contravening to the Regulatory provisions.
- Right to get updates with respect to various service requests filed with the RTA.

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## DOs and DON'Ts for Investor

Dos	Don'ts
<ol style="list-style-type: none"><li>1. Encash dividend/Interest regularly to avoid transfer of unclaimed amount/underlying securities to IEPF.</li><li>2. Follow up diligently and promptly if you have not received allotment intimation/ certificate / dividend / interest etc.</li><li>3. Ensure that your PAN is registered with the RTA for all your folios.</li><li>4. Ensure nomination is registered for all your securities to smoothen the transmission.</li><li>5. Ensure that all KYC details viz., full postal address with PIN, mobile number, e-mail address etc. are updated to facilitate the RTA for sending communication.</li><li>6. Ensure that correct and complete Bank details are recorded with RTA to facilitate prompt electronic credit of dividend / interest / redemption amounts and eliminate possibility of unclaimed amounts / underlying securities being transferred to IEPF.</li><li>7. Promptly inform the RTA in writing and complete required formalities in case of loss of securities.</li><li>8. Ensure that the documents provided for availing any investor service request are complete in all respects and keep copies of documents sent to the RTA.</li><li>9. Monitor all corporate announcements pertaining to investments made.</li></ol>	<ol style="list-style-type: none"><li>1. Do not keep your folios without PAN.</li><li>2. Do not keep your folios without nomination</li><li>3. Do not deal with unauthorized persons for any investor service requests such as change in / updation of address, e-mail address, mobile number and bank details.</li><li>4. Do not share security details, viz., folio number, certificate number, distinctive number(s), bank details, specimen signature, KYC documents, etc. with unknown person(s).</li></ol>

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## Grievance Redressal – Modes and Escalation Mechanism

The process of investor grievance redressal is as follows:

1.	Investor complaint/Grievances	<p>Investor can lodge complaint/grievance against RTA in the following ways:</p> <p><u>Mode of filing the complaint with Listed Company/RTA:</u></p> <p>Investor can approach the Listed Company/RTA at the designated Investor Grievance e-mail ID of the Listed Company/RTA. The Listed Company/RTA will strive to redress the grievance immediately, but not later than 21 days of the receipt of the grievance</p> <p><u>Mode of filing the complaint with stock exchanges</u></p> <p>i. SCORES 2.0 (a web based centralized grievance redressal system of SEBI) (<a href="https://scores.sebi.gov.in">https://scores.sebi.gov.in</a>)</p> <p><u>Two level review for complaint/grievance against RTA:</u></p> <ul style="list-style-type: none"> <li>• First review done by Designated body/Exchange</li> <li>• Second review done by SEBI</li> </ul> <p>ii. Emails to designated email IDs of Exchange</p>
2.	Online Dispute Resolution (ODR) platform for online Conciliation and Arbitration	<p>If the Investor is not satisfied with the resolution provided by the Market Participants, the Investor has the option to file the complaint/ grievance on SMARTODR platform for its resolution through online conciliation or arbitration.</p>

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3.	Steps to be followed in ODR for Review, Conciliation and Arbitration	<ol style="list-style-type: none"><li>1. Investor to approach Market Participant for redressal of complaint</li><li>2. If investor is not satisfied with response of Market Participant, he/she has either of the following 2 options:<ol style="list-style-type: none"><li>i. May escalate the complaint on SEBI SCORES portal.</li><li>ii. May file a complaint on SMARTODR portal for its resolution through online conciliation and arbitration.</li></ol></li><li>3. Upon receipt of complaint on SMARTODR portal, the relevant MII will review the matter and endeavor to resolve the matter between the Market Participant and investor within 21 days.</li><li>4. If the matter could not be amicably resolved, then the matter shall be referred for conciliation.</li><li>5. During the conciliation process, the conciliator will endeavor for amicable settlement of the dispute within 21 days, which may be extended with 10 days by the conciliator with consent of the parties to dispute.</li><li>6. If the conciliation is unsuccessful, the investor may request to refer the matter for arbitration.</li><li>7. The arbitration process to be concluded by arbitrator(s) within 30 days, which is extendable by 30 days with consent of the parties to dispute.</li></ol>
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