INVESTORS GRIEVANCE REDRESSAL POLICY

INTRODUCTION

The Company's Equity Shares are listed on BSE Limited (BSE). The Company's Ordinary Equity Shares are under compulsory trading in demat form only. The matters related to transfer of securities of the Company & Shareholders/Investors Grievance and related function of the Company are outsourced to M/s. Purva Sharegistry (India) Private Limited. The Secretarial Department oversees the activities of the Registrar and Transfer Agents to ensure timely transmission and demat of shares and prompt service in investor related matters.

APPLICABILITY

The objective of the Policy is to promote and build prompt Investor Grievance Redressal mechanism and investor friendly relations. The Policy thus recognizes the investors' right to always have a contact address available to enable them to query or record a grievance.

DEFINITION

For the purpose of this policy, the following words will carry the meaning as under:

"Board" means the Board of Directors of Mini Diamonds (India) Limited.

"Company" means Mini Diamonds (India) Limited

GRIEVANCE HANDLING MECHANISM

The Company has an established mechanism for investor service and grievance handling, with M/s. Purva Sharegistry (India) Private Limited and the Compliance Officer appointed by the Company for this purpose, being the important functional nodes.

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

- 1. The Company has a designated email ID <u>compliance@minidiamonds.net</u> 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 shareholders and is also mentioned on the website of the Company.
- 2. 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 immediately thereafter informed to M/s. Purva Sharegistry (India) Private Limited.

DW-9020 Bharat Diamond Bourse, Bandra Kurla Complex, Bandra-East, Mumbai – 400051. Email: accounts@minidiamonds.net Phone: 022 4964 1850, CIN: L36912MH1987PLC042515

- 4. Corporate Secretarial Department 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.
- 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 M/s. Purva Sharegistry (India) Private Limited.
- 6. Status Report is obtained periodically from M/s. Purva Sharegistry (India) Private Limited. in respect of various correspondences and complaints received by the Company directly or by M/s. Purva Sharegistry (India) Private Limited.
- 7. 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.
- 8. The Status of receipt, redressal and pendency of all the complaints are placed before the Stakeholders Relationship Committee and the Board.
- 9. M/s. Purva Sharegistry (India) Private Limited being the Registrars and Transfer Agents (RTA) of the Company is primarily responsible to resolve the investor's grievances. M/s. Purva Sharegistry (India) Private Limited is responsible for discharging investor service functions effectively, efficiently and expeditiously.
- 10. The complaints received through Stock Exchanges are attended immediately.
- 11. All the investor complaints/grievance received online through "SEBI Complaints Redress System" (SCORES) are checked regularly and replied/resolved expeditiously.

The Company has also constituted the Stakeholders Relationship Committee (SRC) which functions to examine and redress complaints by shareholders and investors. The SRC meets as often as required to resolve shareholders' grievances including complaints related to transmission of shares, non-receipt of annual report, non-receipt of declared dividends, issue of new/duplicate certificates etc. The SRC also reviews measures taken by the Company for effective exercise of voting rights by Shareholders.

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.

CONTACT DETAILS

Contact details	Address

DW-9020 Bharat Diamond Bourse, Bandra Kurla Complex, Bandra-East, Mumbai – 400051. Email: accounts@minidiamonds.net Phone: 022 4964 1850, CIN: L36912MH1987PLC042515

For share related	Company Secretary:	M/s Purva Sharegistry
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Matters		()
	Tel: +91 90229 62295	Unit no. 9 Shiv Shakti Ind.
		Estt J .R. Boricha marg
	Registrar and Share Transfer	Lower Parel (E) Mumbai
	Agent	400 011
	Tel: +91 22 4961 4132	
	+91 22 3199 8810	
	Email:	
	support@purvashare.com	
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	Agent	400 011
	Tel: +91 22 4961 4132	
	+91 22 3199 8810	
	Email:	
	support@purvashare.com	
	Website:	
	www.purvashare.com	

MISCELLANEOUS

The Company Secretary is authorised to amend the Policy to give effect to any changes / amendments notified by the Ministry of Corporate Affairs or SEBI. The amended Policy shall be placed before the Stakeholder Relationship Committee for noting and ratification.

This Policy shall be effective from April 01, 2019 and can be modified, withdrawn or suspended by the Company at its sole discretion without any prior intimation.