

GRIEVANCE REDRESSAL POLICY

Preamble:

This policy lays down the guidelines for addressing the complaints/grievances raised by the stakeholders (external and internal) such as investors, lenders, suppliers, employees, workers, customers, contractors, local community etc. in a time bound manner in compliance with the directions issued by the regulators.

Objective:

The objective of this policy is to provide a platform for stakeholders to address their grievances, concerns or complaints in a systematic and trustful manner. The policy aims to treat all stakeholders fairly, equally to institute a system to ensure that all complaints are treated promptly and dealt with allotted time frames.

Applicability:

This policy is applicable to all the stakeholders of **PNC Infratech Ltd** (Parent Company) and its wholly owned subsidiaries (hereinafter referred as "the Company").

Definition of Grievances

Grievances include any communication that expresses dissatisfaction in respect of the organization's code of conduct or policy or deficiency of service and seeks remedial action but do not include the following-

- Complaints which are not specific in nature;
- Communicationswhich offer suggestions and/or seek guidance or explanation.

Guidelines relating to Grievance Redressal

- All grievances shall be made writing. No oral grievance shall be entertained;
- Grievance shall be treated with utmost confidentiality and sensitivity;
- Grievances from stakeholders (other than shareholders and investors) will be handled as per procedure provided in Part A whereas grievances from shareholders and investors will be handled in accordance with procedure provided in Part B.



<u>Part A</u>

Procedure to raise concerns/grievances (Other than shareholders or investors)

All sites will have a complaint register and any stakeholders can raise concerns/ lodge grievances, if any, through this complaint register. Alternatively, stakeholders can also submit their grievance/s at **complianceofficer@pncinfratech.com**

The Company Secretary will be the Chief Complaint Officer and will be responsible for disposal of such complaints

Reporting and Redressal procedure

Project Managers shall take up the concerns/grievances to the Project Director and the same shall be addressed within 30 days after thoroughinvestigation/enquiry about the concern/grievance.

The Project Manager will contact the stakeholder, who has raised grievance, with resolution and gather feedback on the grievance process from the stakeholder.

All such grievances received and their status shall be reported to the Chief Complaint Officer in addition to the Executive Director (in charge of the site) in timely manner.

Maintenance of records

All records of grievances, investigation/ enquiry reports, discussion with the stakeholders, resolution and closure of grievances shall be recorded and preserved in a confidential manner.

Communication of the policy

The stakeholders will be made aware of the policy through various communication channels, meetings or personal interactions. Further the company shall put this on its website i.e. <u>www.pncinfratech.com</u>.

<u>Review</u>

This procedure is to be reviewed periodically by the Chief Complaint Officer or any other person authorised by the Board.



<u>Part B</u>

Procedure to raise concerns/grievances by Investors/Shareholders.

The Company is currently registered on the **SCORES** platform of the SEBI to deal with investor complaints in the manner specified by the SEBI and also registered on the Smart ODR portal (Securities Market Approach for Resolution through ODR portal) to help investors access efficient dispute resolution.

The company has a separate designated email for redressal of investor complaints i.e. **complianceofficer@pncinfratech.com**

The company seeks to redress complaints as expeditiously as possible, not later than 30 working days from the date of receipt.

Responsibility

The Company Secretary and compliance officer of the Company is responsible to oversee the redressal of shareholders/investors complaints.

Review and Reporting

In order to comply with relevant provisions of the Companies Act, 2013, SEBI Regulations, 2015 the company has constituted a committee of Board namely, **Stakeholders Relationship Committee ('SRC').**The Company Secretary will ensure that all complaints received from investors and shareholders along with action taken on the same are also put up before the SRC.

The Company shall file with recognized stock exchange on a quarterly basis a statement detailing the redressal of investor grievances in such form and within the timelines as may be specified by the SEBI.The said report shall also be placed before the Board of Directors of the Company on quarterly basis for review. The SRC shall periodically review the status of investor complaints and their redressal undertaken by the Company atleast once in a year. The company has a functional website i.e.<u>www.pncinfratech.com</u> whereat all the financial and other relevant information are available.

Policy Review and Amendments

The Board of Directors on its own and / or as per the recommendations of Risk Management Committee can amend / review this Policy, as and when deemed fit and shall be updated accordingly.

In case of change/amendment in the applicable regulatory provisions, the applicable regulatory provisions as for, shall prevail over this policy and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

This policy shall be effective from the day of its approval in Board Meeting.

This policy has been approved by the Board of Directors on 31.10.2023 and last revised on 10.02.2025. This shall be displayed on the website of the Company.