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LATENT VIEW ANALYTICS LIMITED

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INVESTOR GRIEVANCE REDRESSAL POLICY

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INVESTOR GRIEVANCE REDRESSAL POLICY

1. Preamble & Objective

Latent View Analytics Limited (“Company”) is committed to adhere to the highest standards of investor relations and provide efficient services to them and effectively address and redress their grievances in a timely manner.

With this objective, the Company has formulated the Investor Grievance Redressal Policy (IGR Policy) as recommended by Stakeholders Relationship Committee and approved by Board at its meeting held on _____. The Policy is effective from _____ in line with the Companies Act or SEBI Listing Regulations, or by any other regulatory authority.

This policy document is to enable to put in place an effective and suitable mechanism for receiving and addressing requests/complaints from investors with specific emphasis on resolving such grievance/complaints fairly and expeditiously.

The Company’s equity shares are listed on the recognized stock exchanges viz., BSE Limited (BSE) and National Stock Exchange of India Limited (NSE).

Pursuant to various statutes and by virtue of their shareholding in the Company, shareholders enjoy several rights, which inter-alia include the right to receive (i) annual reports & other documents addressed to the shareholders(ii) dividend and other corporate action benefits if declared by the Company and (iii) such other rights available under law for the time being in force.

To serve the investors in a faster and efficient manner, the Company has appointed Link Intime India Private Limited as its Registrar & Share Transfer Agents (“RTA”). The RTA is primarily responsible for handling of shareholders/ investors grievances and related functions of the Company. For contact details, refer to Contact Detail section mentioned in this Policy.

The Board has appointed the Company Secretary to act as the Compliance Officer of the Company under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”). The Company Secretary is responsible to ensure prompt and effective services provided to the shareholders and monitoring the dedicated email address of the Company for investor grievances.

In addition to the above, the Policy broadly defines its investor servicing timelines and further lays down the process for redressal of requests/complaints and the escalation matrix thereof.

2. Definition

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

a. **“Board”** means the Board of Directors of Latent View Analytics Limited.

b. **“Company”** means Latent View Analytics Limited.

c. **“Stipulated Turnaround Time ”** means the timelines as specified in the Investor Timelines section of this Policy.

The words and phrases not defined under this Policy will carry the same meaning as defined under the Articles of Association of the Company; the Securities and Exchange Board of India Act, 1992 read with the rules and regulations made thereunder, including the Listing Regulations; and the Companies Act, 2013 read with the rules made thereunder.

3. Investor Service Timeline

The Company and its RTA follow the below mentioned timelines while handling requests/complaints from the Investors:

Particulars	Stipulated Turnaround Time #
Dividend related queries	Within 30 Days
Demat requests	Within 15 Days
Remat requests	Within 30 Days
Allotment/ Refund related	Within 15 Days
Other requests - such as change of address, non-receipt of the annual report/request for duplicate copy of Annual report and updation of bank details, etc.	Within 30 Days
Scores registered complaints	Within 21 days

Note:

- I. In case statutory timelines for redressal of any grievance, not specifically mentioned here, have been prescribed, the Company / RTA shall address such grievance within the timeline as prescribed under law.
- II. Stipulated Turnaround Time are considered from the receipt of the valid requests/complaints in writing with complete information and supporting documents.
- III. In case timelines for redressal of any grievance not specifically prescribed in the policy, the Company/ RTA shall address such grievance within the timelines as prescribed under applicable law.

4. Classification of Shareholder Communication

The Company receives various correspondence/ communication from the shareholders/ investors relating to the shares, annual reports, dividends and ancillary matters. These communications may either be complaints or mere queries/ requests by the shareholders.

The Company presently follows a set of guidelines for classifying the shareholders' communication between general correspondence/ requests/ complaints, etc. These guidelines are internal to the Company.

The Company strives to follow highest standards of corporate governance, transparency and disclosures at all times. With a view to ensure greater transparency and as a part of Company's investor-friendly initiatives, the Stakeholders Relationship Committee has considered it appropriate and desirable to formally document the present guidelines w.r.t classification of shareholders' communication through this Policy.

5. General Principle guiding classification of shareholders' communication

a. Criteria for considering communication as request or complaint.

Sr. No	Communication considered as a request	Communication considered as a complaint
a.	Non-receipt of annual report	
	<p>First request or any such communication w.r.t. non-receipt of the 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.</p> <p>Such communication shall be treated as a request for an additional copy of the annual report. The company shall respond to the request by intimating the original date of dispatch of the annual report and will also share a copy of the annual report in compliance with the shareholder's request.</p>	<p>Subsequent request(s) for non-receipt of annual report to be treated and recorded as a complaint if,</p> <p>→ the Company / RTA has not dispatched the annual report to the shareholder on or before the due date(s), or</p> <p>→ the Company / RTA has not responded to shareholder's request within the stipulated turnaround time.</p>
b.	Non-receipt of dividend	
	<p>First request or any such communication w.r.t. 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</p>	<p>Any communication w.r.t. non-receipt of dividend warrants / demand drafts sent to the Company or to the RTA after the expiry of the stipulated turnaround time</p>

	<p>dispatched dividend warrants / demand drafts on or before the due date(s).</p> <p>When the Company is unable to pay out the dividend:</p> <p>➔In case where the dividend is to be credited to the bank account of the shareholder, and such credit has been declined by the bank, the Company will pay out the dividend through a dividend warrant / demand draft in favour of the shareholder.</p> <p>➔In case the dispatched dividend warrant / demand draft is returned undelivered, the Company will proceed with re-dispatching the dividend warrant / demand draft only upon a written request by the shareholder. Such communication from the shareholder will be treated as a request and not a complaint.</p>	for issuance of duplicate dividend warrant will be considered as complaint.
c.	Non-receipt of share certificates	
	<p>Non-receipt of duly authenticated share certificate(s) upon sub-division / transfer / transmission / consolidation / re-materialization will be considered as a query if, the Company has dispatched the share certificates within prescribed time limits.</p> <p>The Company shall respond to the query by sharing details of dispatch to the shareholders. It is clarified that upon the dispatch of share certificate through registered post or courier or any other approved mode, the Company shall be deemed to have discharged its duty and the shareholders are expected to coordinate with the postal / courier agency for the share certificates dispatched.</p>	Communication w.r.t. non-receipt of duly authenticated share certificate(s) after the expiry of the statutory period for giving effect to the respective request will be treated as a complaint if, the Company has not dispatched the share certificates to the shareholder.
d.	Shareholder communication through statutory authorities	
	<p>Any communication from investors through statutory authorities which:</p> <p>➔is not treated as a complaint by the statutory authority, and</p>	At times, requests / grievances are directly communicated to the statutory authorities by the investors. Such communications may not always qualify as a complaint

	<p>→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.</p> <p>As per SEBI circular dated March 26, 2018, any grievances submitted to SEBI through SCORES will not be treated as complaints if the grievance is redressed by the Company within 30 days. Accordingly, such grievances registered with SEBI, will be not treated as complaints by the Company.</p>	<p>under the guidelines adopted by the Company.</p> <p>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.</p> <p>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.</p>
e.	Others	
	<p>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.</p> <p>II. Any communication / suggestions / enquiry about procedures for any action will be considered as a request / general enquiry and not a complaint.</p> <p>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.</p> <p>IV. Incomplete communications, communications without requisite supporting documentation or any communication which is vague or nonspecific in nature will not be treated as a Request/ complaint.</p>	<p>I. 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 a complaint.</p> <p>II. Communications / complaints in relation to matters that are sub-judice will not be treated as a complaint under this Policy.</p>

- b. Multiple correspondence/communications or reminders received for the same matter within the stipulated turnaround time in this Policy for the handling of the query/communication will be treated as one request/complaint.
- c. If a query is resolved after the stipulated turnaround time and there is no reminder from the shareholder during such time period, such query will not be treated as a complaint. The date of receipt of complete information or documents shall be considered for computing the Stipulated Turnaround Time for such request/complaint.
- d. In case of any ambiguity, the Company Secretary shall be the sole authority to decide on the nature and classification of the communication and the decision of the Company Secretary shall be final and binding.

6. Investor Grievance Redressal Mechanism

- a) Investors can lodge a request/complaint for non-receipt of any right available to them or failure of the RTA / Company to comply with any statutory obligation by giving details of their name, folio no., DP ID / Client ID, nature and full particulars of their request/complaint directly to the RTA for share transfer, corporate action and other matters. Investors can directly contact the Compliance Officer appointed by the Company as specified under the Contact Details section of this Policy for request for documents/ inspection by the shareholders.
- b) Any information, other than those specified above or any supporting documentation required for redressal of the request/complaint shall be informed to the investors by the RTA/Company. 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 request/complaints.
- c) In case of non-satisfactory response from RTA, investors can also lodge their request/complaints through the Company's designated email id for investor grievances (investorcare@latentview.com). Alternatively, investors can send their requests/complaints to the registered office of the Company.
- d) If the investor does not receive a reply from the RTA within the stipulated turnaround time, he / she may approach the Company by writing to (investorcare@latentview.com). . Additionally, investors are urged to refrain from sending multiple reminders during the above-mentioned turnaround periods for redressal of their complaints.
- e) 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.

- f) Only requests/complaints sent on the addresses / email ids mentioned in this Policy will be treated as valid complaints.
- g) The Company periodically obtains status report of the complaints from the RTA.
- h) The Stakeholders Relationship Committee is responsible for the examination and redressal of the complaints by investors and the Committee periodically reviews the effectiveness of the redressal mechanism.
- i) As required under Regulation 13 of Listing Regulations, the Company files with the Stock Exchanges and places the statement of investor Grievances at the Board meeting on a quarterly basis. Further, the Company also makes annual disclosure of the statement of investor grievances in its annual report pursuant to the Listing Regulations.

7. Contact Details

The Contact details for submission of requests/complaints relating to the securities of the company are provided below:

Level 1	<p>Link Intime India Pvt. Ltd</p> <p>Registrar and Share Transfer Agents</p> <p>Address: C-101, 1st Floor, 247 Park, Lal Bahadur Shastri Marg Vikhroli (West), Mumbai- 400083, Maharashtra,</p> <p>Email:</p> <p>Tel No: 022 – 49186270</p> <p>Toll free number: 1800 1020 878</p> <p>Email: rnt.helpdesk@linkintime.co.in/ ipo.team@linkintime.co.in</p>
Level 2	<p>Latent View Analytics Limited</p> <p>Mr. P. Srinivasan – Company Secretary & Compliance Officer</p> <p>Address: Neville Tower, 5th Floor, Unit 6,7 and 8, Ramanujan IT City, Rajiv Gandhi Salai, Taramani, Chennai, Tamil Nadu, 600113</p> <p>Tel No: +91 44 4344 1700 Extn: 3748</p> <p>Email: investorcare@latentview.com</p>

Level 3	<p>SEBI SCORES</p> <p>In case if the investor is not satisfied with the response furnished by the RTA or Company to his/ her complaint, he/ she may approach the Securities and Exchange Board of India</p> <p>and file their grievance through “SCORES” the centralized online system for lodging and tracking complaints.,.</p> <p>SCORES facility can be accessed through the web link https://scores.gov.in Filing complaints on SCORES -</p> <p>a) Register on SCORES portal</p> <p>b) Mandatory details for filing complaints on SCORES are name, PAN, address, mobile number, E-mail ID of the complainant.</p>
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8. Responsibility and Review

The Compliance Officer shall ensure that all mandatory provisions of SEBI Regulations and SEBI Investor Protection Guidelines, etc. are complied with and to also ensure that all Investor requests/complaints are addressed to in fair and time-bound manner to the satisfaction of such Investor.

This policy shall be reviewed by the Stakeholder Relationship Committee once in 3 years. Any changes or modification to the policy as recommended by the Committee would be placed before the Board of Directors for approval.

In case of any subsequent changes in the provisions of the Act or any other regulations which makes any of the provisions in the policy inconsistent with the Act or regulations, then the provisions of the Act or regulations would prevail over the policy and the provisions in the policy would be modified in due course to make it consistent with law.

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