KOOLKING INDUSTRIES INDIA LIMITED
INVESTOR GRIEVANCE REDRESSAL POLICY

CIN: U28129PB2008PLC031668
Registered Office: Village Ratolan, Dhuri Road, Malerkotla-148023, Punjab
Website: www.kpmgroupindia.com
Policy approved by the Board of Directors on: 05.09.2026
Effective Date: 05.09.2026

1. PREAMBLE

Koolking Industries India Limited ("Company") is committed to providing an efficient and effective mechanism for addressing and resolving grievances and complaints raised by its investors and shareholders.

The Company recognizes the importance of maintaining transparent, fair and prompt communication with its investors and seeks to ensure that investor grievances are addressed in a timely and appropriate manner.

This Investor Grievance Redressal Policy ("Policy") has been formulated in accordance with the applicable provisions of the Companies Act, 2013, the Securities and Exchange Board of India Act, 1992, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), and other applicable laws, rules, regulations, circulars and guidelines issued by the Securities and Exchange Board of India ("SEBI") and the stock exchanges, as amended from time to time.

2. OBJECTIVE

The objective of this Policy is to:

a. provide a structured mechanism for receiving, registering, monitoring and resolving investor grievances;

b. ensure expeditious and effective redressal of investor complaints;

c. facilitate easy access to the Company for investors for raising their queries and grievances;

d. establish responsibility and accountability for handling investor grievances;

e. ensure compliance with applicable statutory and regulatory requirements relating to investor grievance redressal; and

f. maintain appropriate records of investor complaints and the action taken thereon.

3. SCOPE

This Policy shall apply to all shareholders, investors, security holders and other persons having grievances relating to securities issued by the Company and matters connected therewith.

The Policy shall cover, inter alia, grievances relating to:

- non-receipt of dividend;
- non-receipt of share certificates, where applicable;
- transmission/transposition of securities;
- transfer of securities;
- dematerialisation/rematerialisation of securities;

- issue of duplicate securities;
- change of address, bank details or other investor particulars;
- non-receipt of corporate benefits;
- issues relating to demat accounts and credit of securities;
- discrepancies in securities or corporate actions;
- non-receipt of annual reports or other shareholder communications; and
- any other matter relating to investor services falling within the Company's responsibility.

4. DEFINITIONS

Unless the context otherwise requires:
"Board" means the Board of Directors of Koolking Industries India Limited.
"Company" means Koolking Industries India Limited.
"Compliance Officer" means the Company Secretary and Compliance Officer of the Company appointed in accordance with applicable laws.
"Investor" means any shareholder, security holder or other person holding or having an interest in securities of the Company.
"Investor Grievance" means any complaint, representation or grievance raised by an investor relating to securities issued by the Company or investor services provided by or on behalf of the Company.
"RTA" means the Registrar and Share Transfer Agent appointed by the Company from time to time.
"SCORES" means the SEBI Complaints Redress System or such other electronic platform/system as may be prescribed by SEBI from time to time.
Words and expressions used but not defined herein shall have the meaning assigned to them under applicable laws and regulations.

5. GOVERNANCE OF INVESTOR GRIEVANCES

The Company shall designate appropriate officials for handling and redressing investor grievances.
The **Company Secretary and Compliance Officer** shall have overall responsibility for monitoring investor grievances and ensuring compliance with applicable statutory and regulatory requirements.
The Company may, wherever appropriate, seek assistance from its RTA, depositories, stock exchanges, merchant bankers or other intermediaries for resolution of investor grievances.
The RTA shall assist the Company in handling investor-related matters pertaining to records maintained by the RTA.

6. MODE OF LODGING INVESTOR GRIEVANCES

Investors may lodge their grievances with the Company through:

1. **Email:** cs@kpmgroupindia.com
2. **Physical correspondence:**
   The Company Secretary & Compliance Officer
   Koolking Industries India Limited
   Village Ratolan, Dhuri Road, Malerkotla-148023, Punjab
   Ph: 01675-299181

3. **Registrar and Share Transfer Agent:**
   KFin Technologies Limited
   301, The Centrium, 3rd Floor, 57, Lal Bahadur Shastri Road, Nav Pada, Kurla (West), Mumbai – 400 070, Maharashtra
   Email ID: einward.ris@kfintech.com
   Ph: +022 4617 0911

4. **SCORES:**
   Investors may also lodge their complaints through the SEBI SCORES platform in accordance with the applicable SEBI framework.

The Company shall prominently display the relevant investor grievance contact details on its website.

7. PROCEDURE FOR REDRESSAL OF INVESTOR GRIEVANCES

Upon receipt of an investor grievance:

a. the grievance shall be recorded and acknowledged, wherever appropriate;

b. the grievance shall be examined by the Compliance Officer and/or the designated officials of the Company;

c. where the matter relates to records or services handled by the RTA, the grievance shall be forwarded to the RTA for necessary action;

d. the Company/RTA shall examine the grievance and take appropriate corrective action;

e. where additional information or documents are required from the investor, the same shall be communicated to the investor;

f. the investor shall be informed of the action taken or resolution provided in respect of the grievance; and

g. appropriate records of the grievance, correspondence and action taken shall be maintained by the Company.

The Company shall endeavour to resolve investor grievances expeditiously and within the timelines prescribed under applicable laws and regulations.

8. TIMELINES FOR REDRESSAL OF INVESTOR GRIEVANCES

The Company shall ensure that investor grievances are addressed and resolved within the timelines prescribed under applicable laws, regulations, circulars and guidelines issued by the Securities and Exchange Board of India ("SEBI"), the stock exchanges, the Ministry of Corporate Affairs and other applicable regulatory authorities, as amended from time to time.

The following timelines shall, inter alia, apply:

(a) Complaints received through SCORES

Complaints received by the Company through the SEBI Complaints Redress System ("SCORES") shall be resolved and the Action Taken Report ("ATR") shall be submitted/uploaded on SCORES within **21 calendar days** from the date of receipt of the complaint by the Company. Failure to submit the ATR within the stipulated period shall result in automatic escalation of the complaint for first-level review in accordance with the SCORES framework.

(b) First-level review under SCORES

Where an investor is dissatisfied with the ATR submitted by the Company, the investor may seek a first-level review within **15 calendar days** from the date of the ATR.

Where a first-level review is sought, the concerned Designated Body shall submit its ATR to the investor within **10 calendar days**, in accordance with the applicable SCORES framework.

(c) Second-level review under SCORES

Where an investor is dissatisfied with the ATR submitted pursuant to the first-level review, the investor may seek a second-level review within **15 calendar days** from the date of the ATR submitted by the Designated Body.
The second-level review shall thereafter be undertaken by SEBI in accordance with the applicable SCORES framework.

(d) Quarterly statement of investor complaints

In accordance with Regulation 13(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company shall file with the recognised stock exchange(s), on a quarterly basis, a statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, those disposed of during the quarter and those remaining unresolved at the end of the quarter, **within 21 days from the end of each quarter.**
The statement shall be placed before the Board of Directors on a quarterly basis in accordance with Regulation 13(4) of the SEBI Listing Regulations.

(e) Transfer / transmission of securities

Where applicable, in accordance with Section 56(4) of the Companies Act, 2013, the Company shall deliver certificates of all securities transferred or transmitted within the period prescribed under the applicable provisions of the Companies Act, 2013 and the rules made thereunder.

(f) Dividend-related matters

Where dividend is declared by the Company, the Company shall comply with the applicable provisions of the Companies Act, 2013 relating to payment of dividend, including the requirement to pay the dividend within **30 days from the date of declaration**, subject to the exceptions prescribed under applicable law.
Where any dividend amount remains unpaid or unclaimed after the expiry of the prescribed period, the Company shall comply with the applicable provisions relating to transfer of such amount to the Unpaid Dividend Account and all consequential requirements.

(g) Other investor grievances

For investor grievances for which a specific statutory or regulatory timeline has not been prescribed, the Company shall endeavour to redress such grievances **expeditiously and in accordance with the applicable regulatory framework**, having regard to the nature and complexity of the grievance.
No specific period shall be construed as a statutory timeline for such grievances unless prescribed under applicable law, regulation, circular, notification or direction of the competent regulatory authority.

(h) Prevailing statutory timelines

The timelines prescribed under this Policy shall automatically stand modified to the extent of any amendment, replacement or revision thereof by SEBI, the stock exchanges, the Ministry of Corporate Affairs, the depositories or any other competent regulatory authority.
In case of any inconsistency between this Policy and the applicable law or regulatory framework, the provisions of the applicable law or regulatory framework shall prevail.

8. GRIEVANCES RECEIVED THROUGH SCORES

The Company shall be registered on the SCORES platform and shall comply with all applicable requirements relating to handling and redressal of complaints received through SCORES.
Investors are generally required to approach the concerned listed entity/RTA in the first instance. Where the grievance remains unresolved or the investor is dissatisfied with the response, the investor may approach SEBI through SCORES, as per the applicable framework.
The Compliance Officer shall be responsible for ensuring that complaints received through SCORES are appropriately attended to and responded to within the applicable timelines.
The Company shall submit such reports, action taken reports and other information as may be required by SEBI or the stock exchanges from time to time.

9. ONLINE DISPUTE RESOLUTION

Where applicable, investors may avail themselves of the Online Dispute Resolution ("ODR") mechanism in accordance with the framework prescribed by SEBI.
The Company shall comply with the applicable requirements relating to escalation of investor grievances to the ODR mechanism.
SEBI's current grievance framework provides for an escalation path from the listed company/RTA to SCORES and, where applicable, further to the ODR mechanism.

10. RESPONSIBILITIES OF THE COMPLIANCE OFFICER

The Compliance Officer shall:
a. oversee the investor grievance redressal mechanism of the Company;
b. coordinate with the RTA and other intermediaries for resolution of investor complaints;
c. monitor the status of investor complaints;
d. ensure timely response to complaints received directly by the Company and through regulatory platforms;
e. maintain appropriate records of investor grievances and their resolution;
f. ensure necessary filings and disclosures relating to investor grievances with the stock exchanges and other regulatory authorities;
g. place the requisite statement/report relating to investor grievances before the Board at prescribed intervals; and
h. perform such other functions as may be prescribed under applicable laws.

11. RESPONSIBILITIES OF THE RTA

Where the Company has appointed an RTA, the RTA shall:
a. maintain investor records in accordance with applicable laws;
b. receive and process investor service requests;
c. assist in resolution of investor grievances;
d. maintain appropriate records of complaints and their resolution;
e. coordinate with the Company in responding to investor complaints;
f. provide periodic reports relating to investor grievances to the Company; and
g. comply with all applicable SEBI, stock exchange and depository requirements.

12. QUARTERLY STATEMENT OF INVESTOR GRIEVANCES

The Company shall prepare and submit the statement of investor complaints to the recognized stock exchange(s) in accordance with the applicable provisions of the SEBI Listing Regulations.
The statement shall contain, inter alia:

Particulars	**Number of Complaints**
Complaints pending at the beginning of the quarter	[●]
Complaints received during the quarter	[●]
Complaints disposed of during the quarter	[●]
Complaints remaining unresolved at the end of the quarter	[●]

The statement shall be placed before the Board of Directors on a quarterly basis, as required under applicable regulations. Regulation 13 presently requires the quarterly statement to be filed within 21 days from the end of the quarter.

13. ESCALATION MECHANISM

If an investor does not receive a satisfactory response within a reasonable period, the investor may escalate the matter to the Compliance Officer of the Company.
The investor may thereafter approach SEBI through the SCORES platform in accordance with the applicable regulatory framework.
The Company shall cooperate with SEBI, stock exchanges, depositories, ODR institutions and other regulatory authorities in relation to investor grievances.

14. EXCLUSIONS

The following matters may not ordinarily be treated as investor grievances under this Policy where they fall outside the Company's responsibility:
a. matters relating exclusively to a broker, depository participant or other intermediary;
b. disputes between investors;
c. matters pending before a court, tribunal, arbitrator or other judicial/quasi-judicial authority;
d. matters which are not related to the securities or investor services of the Company; and
e. matters specifically excluded from the jurisdiction of SCORES or other regulatory grievance mechanisms.
Where appropriate, the Company shall guide the investor to the relevant authority or intermediary.

15. CONFIDENTIALITY

The Company shall maintain reasonable confidentiality in respect of investor complaints and personal information received from investors, subject to applicable legal and regulatory requirements.
Investor information shall be used only for the purpose of addressing the grievance and fulfilling applicable statutory and regulatory obligations.

16. RECORD MAINTENANCE

The Company shall maintain appropriate records of:

- investor complaints received;
- date of receipt;
- nature of complaint;
- correspondence exchanged;
- action taken;
- date of resolution;
- complaints pending; and
- complaints received through regulatory platforms.

Such records shall be maintained for the period prescribed under applicable laws and the Company's document retention policy.

17. REVIEW OF THE POLICY

The Policy shall be reviewed periodically to ensure that it remains consistent with applicable laws, regulations, circulars and guidelines issued by SEBI, stock exchanges, depositories and other regulatory authorities.

The Board of Directors may amend, modify or revise this Policy from time to time on the recommendation of the Compliance Officer or as may be required pursuant to changes in applicable law.

18. DISCLOSURE

This Policy shall be made available on the Company's website in accordance with applicable regulatory requirements.

The Company shall also prominently disclose the details of the designated officials responsible for investor grievance redressal, investor grievance email address and other relevant contact details on its website.

19. GOVERNING LAW

This Policy shall be governed by and construed in accordance with the laws of India.

In case of any conflict between this Policy and any statutory or regulatory provision, the provisions of the applicable law, regulation, circular or guideline shall prevail.

For and on behalf of
KOOLKING INDUSTRIES INDIA LIMITED

For Koolking Industries India Ltd.

Company Secretary

KOOLKING INDUSTRIES INDIA LIMITED * MALERKOTLA *

Company Secretary & Compliance Officer
Name: Kangan Dhamija
Membership No.: 30672
Date: 05.09.2026