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Dear Member,

## **Sub: Introduction of Online Dispute Resolution (ODR) Portal by SEBI for members of the Company**

The Securities Exchange Board of India ("SEBI") vide its circular dated July 31, 2023 has introduced a common Online Dispute Resolution Portal ("ODRP") to facilitate online resolution of all kinds of disputes arising in the Indian Securities Market. The ODRP provides members with an additional mechanism to resolve their grievances. Any unresolved issues pertaining to any service related complaints between members and listed entity including its Registrar & Share Transfer Agent (RTA) in the securities market, will be resolved in accordance with the abovementioned SEBI Circular.

In order to make members aware about the ODR mechanism, the process is given below:

### **Level 1 - Raise with the Company / Venture Capital and Corporate Investments Private Ltd. Registrar and Transfer Agent of the Company - ("RTA"):**

Initially, all grievances/ disputes/ complaints against the Company/RTA are required to be directly lodged with the Company / RTA. Members may lodge the same by sending an email to the RTA at [investor.relations@vccipl.com](mailto:investor.relations@vccipl.com) / the Company at [primaedayar@gmail.com](mailto:primaedayar@gmail.com) in or by sending physical correspondence at:

Venture Capital and Corporate Investments Private Ltd.  
"AURUM", 4th & 5th Floors,  
Plot No.57, Jayabheri Enclave  
Phase - II, Gachibowli, Hyderabad - 500 032  
Ph:040-23818475, Fax:040-23868024  
[investor.relations@vccipl.com](mailto:investor.relations@vccipl.com)

### **Level 2 - SEBI Complaints Redress Systems ("SCORES"):**

The grievances/ disputes/ complaints which remain unresolved at Level 1, or if the member is not satisfied with the resolution provided by the Company/ RTA, then a complaint may be raised on SCORES platform of SEBI which can be accessed at <https://www.scores.gov.in>.

### **Level 3 - ODR Platform:**

In case the member is not satisfied with the resolution provided at Level 1 or 2, then the online dispute resolution process can be initiated through the ODR portal.





Important notes with respect to ODR portal are as under:

- a) The link to access the ODR Portal as well as modalities and operational guidelines of the ODRP including timelines for review/resolution of complaints filed through the portal, manner of proceedings to be conducted by the ODR institutions, roles and responsibilities of Market Infrastructure Intermediaries, Code of conduct for Conciliators and Arbitrators etc. as provided in the SEBI Circular(s) are hosted on our website at [www.primaagro.in](http://www.primaagro.in)
- b) It may be noted that the dispute resolution through the ODR portal can be initiated only if such complaint /dispute is not pending before any arbitral process, court, tribunal or consumer forum or if the same is non-arbitrable under Indian Law.
- c) There shall be no fees for registration of a complaint/dispute on the ODR portal, and the fees for conciliation or arbitration process including applicable GST, stamp duty etc. shall be borne by the Investor/Company/other market participant as the case may be.
- d) For any queries on the above matter, investors may contact the Company's Registrar & Share Transfer Agent, [investor.relations@vccipl.com](mailto:investor.relations@vccipl.com) or the Company Secretary at [primaedayar@gmail.com](mailto:primaedayar@gmail.com)

Yours Faithfully  
For Prima Industries Limited

  
V. R Sadasivan Pillai  
Company Secretary & Compliance officer  
FCS 13001

