STAKEHOLDER'S RELATIONSHIP COMMITTEE POLICY

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BACKGROUND

Stakeholder engagement is an integral part of our operations. We value the concerns of all our stakeholders, associated directly or indirectly with our business. Therefore, it is vital for us to collaborate with our stakeholders on a regular basis to understand their needs and expectations, in order to design informed business strategies that promote long-term sustainable value for all.

SCOPE AND APPLICABILITY

This stakeholder engagement policy outlines our overarching approach to engaging with our stakeholders and applies to all operating entities at a corporate and regional level. It has been put in place to ensure that principles of effective stakeholder engagement are applied consistently across the operational boundary including our subsidiaries and affiliates. Therefore, each business unit in every operating location is required to carry out stakeholder engagement in line with the guidelines of this policy.

OBJECTIVES OF THE POLICY

The purpose of this Policy is to

- establish a framework to guide engagement with our stakeholders in all our activities and operations
- promote effective two-way communication with our stakeholders to strengthen our relationship with them
- enhance stakeholders' trust and confidence in our processes and activities, while promoting a good understanding of stakeholders' needs and expectations

STAKEHOLDER ENGAGEMENT PROCESS

We promote a culture of consistent engagement with every stakeholder group to seek their feedback in order to improve our business processes.

We strive to abide by the following principles when engaging with any stakeholder:

- Establish a process of continuous dialogue to ensure timely and responsive communication with all stakeholder groups and to develop enduring relationships that demonstrate mutual respect, honesty, and transparency
- Establish clear accountability by assigning adequate resources and responsibilities for effective stakeholder engagement
- Acknowledge and assume responsibility about the policies, processes, products, services and associated operations on stakeholders
- Select appropriate methods, tools and channels of engagement which take into account potential stakeholder engagement risks. Potential risks may include participation fatigue, lack of stakeholder integrity, conflicts of interest, disruptive or uninformed stakeholders, and lack of willingness to engage.

- Ensure adequate planning and preparation to understand the stakeholder profile and work with them to facilitate open and honest dialogue.
- Assess the capacity of the stakeholder to effectively engage while selecting the method of engagement.
- Disclose information about the company's activities in a timely and culturally appropriate manner to allow for meaningful collaboration
- Undertake engagement in a non-discriminatory manner that promotes inclusiveness and allows diverse stakeholders to provide feedback for an informed decision-making, including disadvantaged, vulnerable and marginalized stakeholders
- Resolve stakeholder grievances in a just, fair and equitable manner
- Ensure that all communication and interactions with our stakeholders is conducted within the purview of applicable law, any contractual obligations and in line with corporate communication guidelines, while upholding highest respect for stakeholder's human rights and privacy of personal data
- Strive to incorporate stakeholder feedback in developing mutually beneficial company strategies, policies, objectives and initiatives
- Improve performance on stakeholder engagement by sharing good practices and learnings from the engagement process. Outcomes of the stakeholder engagement are to be reported through the company annual report

PURPOSE

The primary function of the Stakeholders Relationship Committee ("**Committee**") is to consider and resolve the grievances of security holders of the Company.

COMMITTEE MEMBERSHIP AND QUALIFICATION

The Chairperson of the Committee shall be a Non-Executive Director and it shall comprise of such other members as may be decided by the Board Directors from time to time.

The Chairperson of the Committee, shall be present at the annual general meetings of the Company to answer queries of the security holders.

SRC Composition as on 05th September 2026:

S.NO.	Name	Designation
1	Ms. Priyanka Sisodiya	Chairperson
2	Ms. Ruchi Chordia	Member
3	Mr. Rishabhh Aneja	Member

MEETINGS AND QUORUMS

The Committee shall meet atleast once in a financial year .

The quorum shall be either two members or one third of the members of the Committee whichever is greater.

ROLE OF THE COMMITTEE

- Resolving the grievances of the security holders of the listed entity including complaints related to transfer/ transmission of shares, non-receipt of annual report, non-receipt of declared dividends, issue of new/ duplicate certificates, general meetings etc.;
- Resolving grievances of debenture holders related to creation of charge, payment of interest/ principal, maintenance of security cover and any other covenants.
- Review of measures taken for effective exercise of voting rights by shareholders;
- Review of adherence to the service standards adopted by the listed entity in respect of various services being rendered by the Registrar & Share Transfer Agent;
- Review of the various measures and initiatives taken by the listed entity for reducing the quantum of unclaimed dividends and ensuring timely receipt of dividend warrants/ annual reports/ statutory notices by the shareholders of the company;
- Allotment, transfer of shares including transmission, splitting of shares, changing joint holding into single holding and vice versa, issue of duplicate shares in lieu of those torn, destroyed, lost or defaced or where the space at back for recording transfers have been fully utilized;
- Formulation of procedures in line with the statutory guidelines to ensure speedy disposal of various requests received from shareholders from time to time;
- To issue duplicate share or other security(ies) certificate(s) in lieu of the original share/ security(ies) certificate(s) of the Company;
- Non-receipt of share certificate(s), non-receipt of declared dividends, non-receipt of interest/ dividend warrants, non-receipt of annual report and any other grievance/ complaints with Company or any officer of the Company arising out in discharge of his duties;
- Oversee the performance of the Registrar & Share Transfer Agent and also review and take note of complaints directly received and resolved them;
- Oversee the implementation and compliance of the Code of Conduct adopted by the Company for prevention of Insider Trading for Listed Companies as specified in the Securities & Exchange Board of India (Prohibition of insider Trading) Regulations, 2015 as amended from time to time;
- Any other power specifically assigned by the Board of Directors of the Company from time to time by way of resolution passed by it in a duly conducted Meeting; and

- Such roles as may be delegated by the Board and/ or prescribed under the Companies Act, 2013 and SEBI Listing Regulations or other applicable law.

IMPLEMENTATION

The Committee may issue guidelines, procedures, formats, reporting mechanism and manuals in supplement and for better implementation of this policy as considered appropriate. The Committee may delegate any of its powers to one or more of its members.

GRIEVANCE REDRESSAL

All employees are accountable for managing relationships and meeting expectations of internal and external stakeholders within their areas of responsibility. In addition to this, concerns of our stakeholders are addressed by our Grievance Officer while ensuring utmost confidentiality. Should a stakeholder have any concerns, queries, or complaint, they can write to us at: stellarcapital@yahoo.in

AMENDMENTS TO THE POLICY

The Board of Directors on its own and / or as per the recommendations of Committee can amend this Policy, as and when deemed fit.

AMENDMENTS IN THE LAW

Any subsequent amendment / modification in the listing agreement and/or other applicable laws in this regard shall automatically apply to this Policy.

DISSEMINATION OF THE POLICY

The policy shall be hosted on the website of the Company.

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