

## COMPLIANCE CERTIFICATE

To,  
KFin Technologies Limited  
(formerly known as 'KFin Technologies Private Limited')  
Selenium, Tower B, Plot No- 31 & 32,  
Financial District, Nanakramguda, Serilingampally,  
Hyderabad, Rangareddi, Telangana-500032, India.

I, R. Ramakrishna Gupta, Senior Partner, R & A Associates, Practising Company Secretaries has been appointed vide by Letter dated 09<sup>th</sup> January, 2024 by M/s. KFin Technologies Limited (formerly known as 'KFin Technologies Private Limited'), (hereinafter referred to as 'RTA'), having CIN U72400TG2017PLC117649 and having its Registered Office at Selenium, Tower B, Plot No- 31 & 32, Financial District, Nanakramguda, Serilingampally, Hyderabad, Rangareddi, Telangana-500032, India and engaged in the business, inter alia, as Registrar and Share Transfer Agent, registered under SEBI (Registrar to an Issue and Share Transfer Agents), Regulations, 1993 to issue this certificate pursuant to Circular No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2023/72 dated 08<sup>th</sup> June, 2023 issued by the Securities and Exchange Board of India (hereinafter referred to as the "Circulars")

### Management Responsibility:

It is the responsibility of the Management of the RTA to implement the provisions of the circular including designing, maintaining records and devising proper systems to ensure compliance with the provisions and to ensure that the systems are adequate and operate efficiently in compliance with the Circulars issued on an ongoing basis.

### Verification:

On the basis of the information/ documents and explanation furnished to the undersigned by the RTA, for the purpose of certifying the compliance with the Circulars, following have been examined that:

- a) The RTA has a functional website as required by the Circular from where the RTA perform its function through online mode. The website displays the following mandatory information as required by the Circular:
  - i. Basic details of the RTA such as registration number, registered address of Head Office and branches, if any are available in the website.
  - ii. Names and contact details such as email ids etc. of key managerial personnel (KMPs) including compliance officer in the prescribed format are available in the website upon login to the investor portal set up on <https://kprism.kfintech.com/>.



- iii. Step-by-step procedures for various service requests, Frequently Asked Questions (FAQs), procedure for filing a complaint and finding out the status of the complaint, etc. are displayed in the website of the RTA.
- b) The RTA has already set up a user-friendly online mechanism or portal for service requests/ complaints with the following required minimum features as specified by the RTA:
- i. The online system provides an option for the investors to directly apply for login credentials in the portal of the RTA after appropriate authentication/validation mechanism including One Time Passwords (OTPs) on mobile and after successful registration on the portal, the investors are able to view their holdings, lodge service requests/ complaints for the respective companies and can easily track the status of service requests/complaints lodged by them.
  - ii. The RTA has provided in its online portal the standard forms for each relevant of service request/ complaint which can be submitted either through upload of duly filled in relevant standard forms prescribed by SEBI or through fillable relevant standard forms.
  - iii. The RTA has displayed in its website various categories in order to enable the investor to choose the most relevant category for lodging his/her service request/ complaint and also display a list of documents required to be provided by the investor and the instructions thereof for each category.
  - iv. The RTA will seek for additional documents on the basis of specific facts of the matter and for the cases wherein additional due diligence was required to be done.
  - v. The RTA has provided a mechanism in its website where upon raising the service request/ complaint and after uploading of the documents required for processing of investor's service requests/ complaints on the portal, a **URN (Unique Reference Number)** is generated and displayed on the portal. The same is also sent to the investor by way of email registered with RTA. The RTA also advised their investor to indicate the **URN (Unique Reference Number)** while sending physical documents in respect of requests/ complaints already lodged on the portal.
  - vi. The RTA has provided an acknowledgment along with the URN (Unique Reference Number) for the service requests/ complaints where the investor submits only physical documents to the RTA for processing of the request/complaint.
  - vii. The RTA has provided a mechanism in its website where, any investor can track the status of his/her service request/ complaint on website of the RTA.
  - viii. The RTA will process the investor service request only after receipt of physical documents, in cases where the service requests require submission of physical documents.



- ix. The RTA will keep the online request pending for receipt of physical documents for 30 days. However, where the request is pending beyond 30 days due to non-receipt of physical documents from the investor, the request/ complaint is closed and e-mail shall be sent to the concerned investor stating that documents were not received and hence the request is closed.
- x. The RTA has provided mechanism for display of status of every stage of service request/ complaints raised by the investor upon logging into their account. Further the email alerts are sent upon resolution/closure of the service request/ complaint.
- xi. The online mechanism/system has provided the provision for seeking clarifications by the RTA and submission by the investors in response to queries and documents asked by the RTA the including the option of uploading additional documents.
- xii. The RTA has disseminated the availability of this mechanism on their website.

**Certification:**

In our opinion and to the best of our knowledge and according to the verification as considered necessary and explanations furnished to us by the RTA and its Officers, we certify that the RTA has carried out the changes, put the systems in place and implemented the new operating procedures etc. in strict compliance of the Circular.

**Assumptions & Limitations of Scope and Review:**

- a) Ensuring the authenticity of documents and information furnished is the responsibility of the RTA.
- b) Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- c) This certificate is solely for the intended purpose of compliance in terms of aforesaid circular and for your information and it is not to be used, circulated, quoted or otherwise referred to for any other purpose other than compliance with the aforesaid circular.

Date: 29<sup>th</sup> January, 2024  
Place: Hyderabad



For R & A Associates  
Company Secretaries

*R. Ramakrishna Gupta*  
R. Ramakrishna Gupta

Senior Partner

FCS No: 5523

C.P. No: 6696

UDIN: F005523E003323794