



SPANDANA

POLICY FOR THE TRANSFER OF UNCLAIMED AMOUNTS WITH RESPECT TO LISTED NON-CONVERTIBLE SECURITIES AND THE MANNER OF CLAIMING OF SUCH AMOUNTS BY INVESTORS.

Version 1

Date of Approval: April 29, 2024



Policy for transfer of unclaimed amounts with respect to listed Non-Convertible Securities and manner of claiming of such amounts by Investors.

1. Purpose, Scope, and Applicability:

Regulation 61A (2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('LODR Regulations'), provides that, 'where the interest/ redemption amount has not been claimed within thirty days from the due date of interest/ redemption payment, a listed entity shall within seven days from the date of expiry of the said period of thirty days, transfer the amount to an Escrow Account of the Company'.

Further, SEBI vide circular no. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 08, 2023, has laid down a standardized framework for dealing with unclaimed amounts and also mandates that a policy, specifying the process to be followed by investors for claiming respective unclaimed amounts, shall be formulated by all applicable companies.

Accordingly, this Policy is framed under the aforesaid statutory requirements on transfer of unclaimed amounts with respect to listed Non-Convertible Securities and manner of claiming such amounts by Investors.

2. Definitions:

- a) "Act" means the Companies Act, 2013 as amended, modified, supplemented or re-enacted from time to time;
- b) "Applicable Laws" means all applicable statutes, acts, laws, ordinances, rules and regulations, binding judgements, decrees or orders issued by any judicial or quasi-judicial authority as in effect from time to time;
- c) "Board of Directors" or "Board" means Board of Directors of the Company;
- d) "Claimant" means and includes the Investor, legal heir, successors or permitted assigns of the Investor and such other person as may be permitted under the Applicable Laws;
- e) "Due Date" means the date from which interest or redemption amount is payable on the NCS;
- f) "Financial Year" means the accounting year of the Company commencing on 1st April of each calendar year and ending on 31st March of the following calendar year;
- g) "Investor Education and Protection Fund or IEPF" means the fund constituted in terms of Section 125 of the Companies Act, 2013;
- h) "Investor(s)" means persons who have invested in any of the non-convertible



securities of the Company;

- i) “**Nodal Officer**” means the Nodal Officer as designated by the Company in terms of SEBI Circular;
- j) “**Non- Convertible Securities**” or “**NCS**” means debt securities, non-convertible redeemable preference shares, perpetual non-cumulative preference shares, perpetual debt instruments and any other securities as specified by the Securities and Exchange Board of India as issued by the Company and listed on any of the recognized stock exchange;
- k) “**Unclaimed Amount**” mean any interest, dividend, redemption amount with respect to any NCS held by the Investor which has become due to be paid to the Investor, but which has not been paid or claimed within thirty days from the Due Date;
- l) “**SEBI**” means the Securities and Exchange Board of India.

3. **Obligations of the Company:**

- a) **Transfer of unclaimed amounts to Escrow Account** - In terms of Regulation 61A (2) of the SEBI LODR Regulations, within seven days from the date of expiry of the thirty days, the Company shall be required to transfer the unclaimed amount to an Escrow Account to be opened by the Company with any scheduled bank. Any amount transferred to the Escrow Account in terms of Regulation 61A (2) remains unclaimed for a period of 7 years, shall be transferred by the Company to the ‘Investor Education and Protection Fund (IEPF)’ constituted as per Section 125 of the Companies Act, 2013. The Company shall, as and when required, open and maintain one or more Escrow Account (by whatever name called) with one or more scheduled banks.
- b) **Interest in case of default** - In case a default is made in transferring the unclaimed amount to the Escrow Account of the Company, it shall pay, *interest* at the rate of 12% p.a. on the amount that has not been transferred to the said account, for the period of default. The said interest amount shall accrue to the investors in proportion to the amount remaining unclaimed.
- c) **Designating Nodal Officer** - The Company has designated **Mr. Vinay Prakash Tripathi, the Company Secretary & Compliance Officer** of the Company as the ‘Nodal Officer’, who shall be the point of contact for investors entitled to claim their unclaimed amounts, SEBI, Stock Exchange(s) and Depositories. The name, designation and contact information of the Nodal Officer is available on the website of the Company. In case there is a change in the Nodal Officer due to any reason, the Company shall designate another person as a Nodal Officer within 15 days of such change.
- d) **Display of information relating to unclaimed amounts on website** - The Company shall display details (as mentioned in “**Annexure - A**”) relating to unclaimed amounts on its website within 30 days of transferring such amount to the Escrow Account, if required.



- e) **Search facility for investor(s)** - The Company shall provide a search facility on its website for investor(s) to verify if there is any unclaimed amount due and lying in the Escrow Account of the Company based on their PAN and Date of Birth or Name and Depository Participant Identification/ Client Identification.

Upon search, the investor(s) will be able to view the following information:

- Amount due to the investor on the date of payment (in INR).
- Category - interest/ dividend/ redemption amount.
- Date when amount became due (dd/mm/yyyy).
- Amount (in INR) transferred to Escrow Account (including penal interest, if any, for delay in transfer by the Company);
- Date when unclaimed amount was transferred to Escrow Account(dd/mm/yyyy).
- Penal Interest, if any, in the Escrow Account, that accrues to the investor.

4. Process of Claiming Unclaimed Amounts from the Company:

a) **Submission of Claim:**

Any investor (including legal heir/ successor/ nominee of such investor) claiming their unclaimed amount lying with the Company may apply to the Company for payment of such amount, in the format enclosed as “**Annexure B**” to this Policy along with the supporting documents as prescribed in such annexure.

b) **Documents required to be submitted in support of the claim:**

The Investor shall submit the claim application/ request along with the following documents for verification.

- a) a cancelled cheque/ copy of Bank Passbook
- b) proof of holding (Copy of Debenture Certificate / Demat holding Statement),
- c) Self-certified copy of Identity Proof (PAN / Aadhar),
- d) Address Proof (Voters ID Card, Passport)
- e) Any other documents as and when required on case to case basis

If the claim is being submitted by the nominee/ legal heir of the investor, then the following documents shall be provided along with above-mentioned documents:

- a) Duly signed transmission request form by the claimant
- b) Notarised copy of death certificate of security holder
- c) Self-attested copy of Government ID proof of claimant
- d) Original security certificate (In case of securities held in physical mode)
- e) Copy of transaction statement duly attested by Claimant (In case of securities held in demat mode)
- f) No Objection Certificate (NOC) from other heir(s), if applicable
- g) Notarised Will or Succession Certificate
- h) Any other documents as and when required on case to case basis



c) **Manner of submission of claim by the Security Holder:**

The investor may submit their claim either physically addressed to the Nodal Officer at its registered office or over the e-mail at secretarial@spandasphoorty.com, along with prescribed supporting documents.

d) **Timeline within which the investor can submit documents, provide clarifications to queries raised by the Company, etc.**

The Investors can submit their claims with Company w.r.t. unclaimed amount, anytime. Upon receipt of a claim application, if the Company, upon examination, finds it necessary to call for further information or finds such application or document(s) to be defective or incomplete in any respect, it shall intimate the investor, of such need for information or defects or incompleteness, by e-mail or other written communication. The Company shall direct the investor to furnish such information or to rectify such defects or incompleteness or to re-submit such application or document(s) within 30 days from the date of receipt of such communication, failing which the claim may be rejected. However, rejection of claim does not debar an investor from filing a fresh claim.

e) **Timeline within which the claim shall be processed by the listed entity:**

The Company shall within 30 days of receipt of a claim application from an investor or complete information as called upon from the investor, process and remit the payment to the investor using electronic modes of funds transfer.

5. Process of Claiming Unclaimed Amounts from IEPF:

- a) Any person who wishes to claim unclaimed amounts from IEPF may claim the same as per the provisions of Section 125 of Companies Act read with Rule 7 of Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016 as amended from time to time by submitting Form IEPF - 5 available on the website of IEPF Authority.
- b) The Form IEPF - 5 shall be verified by the Nodal Officer of the Company who shall submit verification report to the IEPF Authority.
- c) Based on the verification report submitted by the Company, the claim shall be processed / rejected by the IEPF Authority.

6. Approval & Review:

This policy shall be approved by the Board of Directors and may be amended or repealed by the Board only. However, if the policy requires any change due to change in any regulatory guidelines or change in the Company Secretary, the policy will stand amended to that effect. This policy shall be subject to periodic review and may be revised as necessary to ensure alignment with organizational objectives, changes in regulations, or advancements in



technology. This Policy will be reviewed atleast once in a financial year. This policy is available on the website of the Company.

7. Interpretation

All words and expressions used in this Policy but has not been defined hereunder shall have the same meaning as respectively assigned to them in the Companies Act, 2013 and the rules or regulations framed thereunder or any statutory modification or re-enactment thereto, as the case may be.

In case of any dispute or difference upon the meaning/interpretation of any word or provision in this Policy, the same shall be referred to the Board and the decision of the Board in such a case shall be final.

Annexure-A

ISIN	Amount lying unclaimed Including penal interest, if any (in INR)	Category (Interest/ Dividend/ Redemption amount)	No. of investors	Date when amount became due (dd/mm/yyyy)	Date when unclaimed amount was transferred to Escrow Account (dd/mm/yyyy)	Date when amount is to be transferred to IPEF (dd/mm/yyyy)

Name and designation of the Nodal Officer:
 Email ID and Phone No.:

Annexure-B

Form for submitting claim of unclaimed non-convertible securities and benefits accrued thereon under Regulation 61A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Investors of the Company, whose securities and benefits accrued thereon, is remained unclaimed or unpaid which has been transferred by the Company as per Regulation 61A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('LODR Regulations') may claim such unclaimed amount in the following manner:

Sl. No.	Field Name	Instructions
1.	Details of Investor/Claimant	Enter Name, Address, Email ID and contact details
2.	Category of investor (Corporate/ entity / Individual etc.)	
3.	Capacity in which investor is submitting claim (Self/legal heir/ nominee etc.)	
4.	PAN of Investor/Claimant	
5.	Aadhar Number or Passport/OCI/PIO Card No. (in case of NRI/foreigners)	Enter Aadhaar Number of applicant in case of Indian National. Aadhar number should be correctly filled, failing which the form is liable to be rejected For foreign nationals, enter OCI/PIO Card number, failing which the form is liable to be rejected.
6.	Relation of the Claimant with the Investor (If applicable)	
7.	ISIN/s	
8.	(DP ID / Client ID)	Enter the correct: a. Demat account number (16 digit number - CDSL or IN followed by 14 digits-NSDL or C2 followed by a letter and a 7 digit number, if shares are held in physical mode)
9.	Details of Amount Claimed against each ISIN	Number of non-convertible securities & Amount Claimed
10.	Date when amount became due for payment	

11.	Manner of submission (Hard copy/ Scanned copy through email)	
12.	Number of days in within which the claim is being submitted post completion of 30 days from the Due date	
13.	Details of bank account (Aadhar linked, in case applicant is not NRI/foreigner) in which refund of claim to be made	Enter bank account number, Bank name, and Bank branch, Type of account and IFSC code.
14.	Demat Account Number	Enter Demat Account Number which is mandatory for the applicant claiming shares, failing which the form is liable to be rejected.
15.	Any other relevant information	

Declaration: I hereby declare that all the information given herein above is true, correct and complete including the attachments to this application form and nothing material has been suppressed and above claim has not been made earlier.

Signature of the Investor/Claimant

Enclosures:

1. a cancelled cheque/copy of Bank Passbook
2. proof of holding (Copy of Debenture Certificate / Demat holding Statement),
3. Self-certified copy of Identity Proof (PAN / Aadhar),
4. Address Proof (Voters ID Card, Passport)

In case of any nominee/ legal heir of the investor:

1. Duly signed transmission request form by the claimant
2. Notarised copy of death certificate of security holder
3. Self-attested copy of Government ID proof of claimant
4. Original security certificate (In case of securities held in physical mode)
5. Copy of transaction statement duly attested by Claimant (In case of securities held in demat mode)
6. No Objection Certificate (NOC) from other heir(s), if applicable
7. Notarised Will or Succession Certificate
