## DOCUMENT CONTROL

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| **Policy Name** | Policy For Dealing Unclaimed Amounts on Listed Non-Convertible Securities |
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| **Created by** | Chief Financial Officer |
| **Reviewed by** | Chief Executive Officer |
| **Approved by** | Board of Directors |
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### Statement of Confidentiality

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## CHANGES MADE IN THE CURRENT VERSION SINCE THE LAST APPROVED POLICY

| Sl No | Change | Section | Reference Page No |
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## *Table of Contents*


| S. No. | Particulars | Page No |
|---|---|---|
| 1 | Preamble | 4 |
| 2 | Purpose | 4 |
| 3 | Applicability | 4 |
| 4 | Investor Service and Grievance Handling Mechanism | 4 |
| 5 | Obligations of the Company | 5 |
| 6 | Process of Claiming Unclaimed Amounts by Investors, in Case the Same has Not Been Transferred to IEPF | 6 |
| 7 | Process of Claiming Unclaimed Amounts by Investors, in Case the Same has Been Transferred to IEPF | 7 |
| 8 | Maintenance of Records | 8 |
| 9 | Displaying of Claims Details on Website | 8 |
| 10 | Validity | 8 |
| 11 | Annexure A | 9 |
| 12 | Annexure B | 10 |

## 1. PREAMBLE

This Policy for dealing unclaimed amounts on Non-Convertible Securities ("**Policy**") has been framed by Satin Finserv Limited **("SFL/ Company")** pursuant to the requirements of Regulation 61A (2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 **("Listing Regulations")** read with Securities and Exchange Board of India Circular No. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 08, 2023 regarding procedural framework for dealing with unclaimed amounts lying with entities having listed non-convertible securities and manner of claiming such amounts by investors.

## 2. PURPOSE

This policy specifies the process for dealing with Unclaimed Interest, Dividend and Redemption Amounts **("unclaimed amounts")** lying with the Company with respect to Listed Non-Convertible Securities **("Securities"),** including the steps to be undertaken by the Company/ Registrar and Transfer Agent (RTA) for processing claims of investors.

Non-convertible securities mean debt securities including non-convertible debentures, non-convertible redeemable preference shares, perpetual non-cumulative preference shares, perpetual debt instruments and any other security as specified by the SEBI.

## 3. APPLICABILITY

This policy shall be applicable to SFL's listed non-convertible securities which have unclaimed amounts (interest/dividend/redemption amount) which has not been claimed within 30 (thirty) days from the due date of interest, dividend/redemption payment.

## 4. INVESTOR SERVICE AND GRIEVANCE HANDLING MECHANISM

All investor service matters are being handled by KFin Technologies Limited, which is the **RTA** of the Company. Investors can raise their queries or grievances, relating to their claim at the below address:

**KFin Technologies Limited**
**Unit: - Satin Finserv Limited**
Selenium Tower B, Plot 31-32,
Gachibowli, Financial District, Nanakramguda, Hyderabad – 500 032, Telangana
Tel No.: 9140- 67162222
Website: www.kfintech.com

Investors can also raise their queries or grievances, relating to their claim at below details:

E-mail id: bonds@satinfinserv.com; info@satinfinserv.com
Tel No.: 0124-4715400
Website: www.satinfinserv.com

## 5. OBLIGATIONS OF THE COMPANY

**Transfer of unclaimed amounts to escrow account or any other account for the purpose:** In terms of Regulation 61A (2) of the Listing Regulations:

(a) Within 7 (seven) days from the date of expiry of the 30 (thirty) days the Company shall be required to transfer the unclaimed amounts to an escrow account or any other account for the purpose to be opened by the Company with any Scheduled Bank.
(b) Any amount transferred to the escrow account or any other account for the purpose 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.

**Interest in case of default:** In case a default is made in transferring the unclaimed amounts to the escrow account or any other account for the purpose, it shall pay, interest at the rate of 12% p.a. on the unclaimed 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.

**Designating Nodal Officer:** Company Secretary & Chief Compliance Officer of the Company or in his/her absence any other Officer as designated by the Company is designated as Nodal Officer of the Company for the purpose of this policy who shall be the point of contact for investors (entitled to claim their unclaimed amounts), SEBI, Stock Exchange(s) and Depositories. The details of the same shall be available on the website of SFL. 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 (fifteen) days of such change.

**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 (thirty) days of transferring such amount to the escrow account or any other account for the purpose.

**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 or any other account for the purpose, based on their PAN and date of birth or name and depository participant identification/ client identification.

**Information of unclaimed amount: Upon search, the investor(s) will be able to view the following information:**

(a) Amount due to the investor on the date of payment (in INR);
(b) Category - interest/dividend/redemption amount;
(c) Date when amount became due (dd/mm/yyyy);
(d) Amount (in INR) transferred to escrow account or any other account for the purpose (including penal interest, if any, for delay in transfer by the listed entity);
(e) Date when unclaimed amount was transferred to escrow account or any other account for the purpose (dd/mm/yyyy):

Further, the interest, if any, in the escrow account or any other account for the purpose, that accrues to the investor in proportion to his/ her unclaimed amount, may also be disclosed by the Company.

## 6. PROCESS OF CLAIMING UNCLAIMED AMOUNTS BY INVESTORS, IN CASE THE SAME HAS NOT BEEN TRANSFERRED TO IEPF

(a) **Submission of Claim:** Any investor (including nominee of such investor) claiming their unclaimed amount lying with the Company may send a request letter (by email or hardcopy) to the Company/RTA requesting them to release the unpaid amount by mentioning the Folio number/Client ID & Depository Participant Identification (DP-ID) and the period for which the same has not been received/ claimed in the format enclosed in **"Annexure B"** to this Policy along with following documents:

i. Self-attested copy of PAN;
ii. Self-attested copy of address proof;
iii. Cancelled cheque;
iv. Updated Client Master List;
v. Self-attested copy of passport/ Overseas Citizen of India (OCI) card/ Person of India Origin (PIO) card (for Foreigners/ NRI);
vi. Investor Service Request (ISR)-1 & 2 along with the supporting documents.

- **In case claim is made by legal heir(s), where the securities are held in single name without nomination, the following documents are required to be submitted:**

a) A notarized affidavit from all legal heir(s) made on non-judicial stamp paper of appropriate value, to the effect of identification and claim of legal ownership of the securities.

However, in case the legal heir(s)/claimant(s) are named in the Succession Certificate or Probate of Will or Will or Letter of Administration as may be applicable in terms of Indian Succession Act, 1925 or Legal Heirship Certificate or its equivalent certificate issued by a competent Government Authority ("**Succession Document**"), an affidavit from such legal heir(s)/claimant(s) alone shall be sufficient.

b) Duly signed transmission request form by the legal heir(s)/claimant(s).

c) Original death certificate or copy of death certificate attested by the legal heir(s)/claimant(s) subject to verification with the original or copy of death certificate duly attested by a notary public or by a Gazetted Officer.

d) Self-attested copy of PAN of the legal heir(s)/claimant(s).

e) The Succession Document should be self-attested by legal heir(s)/claimant(s) subject to verification with the original or duly attested by a notary public or by a Gazetted Officer.

In case where Will or a Legal Heirship Certificate or its equivalent certificate issued by a competent Government Authority is submitted, the same shall be accompanied with a notarized indemnity bond from the legal heir(s)/claimant(s) to whom the securities are to be transmitted, in format as specified by SEBI, from time to time.

In case where a copy of Legal Heirship Certificate or its equivalent certificate issued by a competent Government Authority is submitted, the same shall also be accompanied by No Objection from all non-claimants, stating that they have relinquished their rights to such claim.

f) For cases where value of securities is up to Rs. 5 lakhs (in case of securities held in physical mode), and up to Rs. 15 lakhs per beneficial owner (in case of securities held in dematerialized mode), as on date of application, and where the documents mentioned in para (e) are not available, the legal heir(s) /claimant(s) may submit the following documents:

i. No objection certificate from all legal heir(s) stating that they do not object to such transmission or copy of family settlement deed executed by all the legal heirs duly attested by a notary public or by a Gazetted Officer; and

ii. Notarized indemnity bond made on non-judicial stamp paper of appropriate value, indemnifying the Share Transfer Agent/ listed entity, in the format as specified by SEBI, from time to time.

g) **Conditions for rejection/option of re-filing of claim:** Upon receipt of a claim application, if the Company/RTA, 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/RTA shall direct the investor to furnish such information or to rectify such defects or incompleteness or to resubmit such application or document(s) within 30 (thirty) 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.

h) **Timeline:** The Company/RTA shall within 30 (thirty) days of receipt of a claim application from an investor or complete information as called upon from the investor, remit the payment to the investor using electronic modes of funds transfer. Request for release of unpaid amount will be entertained only if all the details of the investor(s) i.e. signature, address and Bank details are matching with the details registered with Company/RTA.

i) **Category of Investor:** While submitting claims, the investor shall be required to clearly select appropriate category in which it is being claimed e.g. self / legal heir / nominee etc.

j) **Website:** This policy shall be displayed on the website of the Company (www.satinfinserv.com).

## 7. PROCESS OF CLAIMING UNCLAIMED AMOUNTS BY INVESTORS, IN CASE THE SAME HAS BEEN TRANSFERRED TO IEPF

In case an investor has not claimed interest/dividend/redemption amount and which has been transferred to the IEPF, the same can be claimed by following the indicative procedure: -

(a) Any investors whose unclaimed amount has been transferred to IEPF, may apply for refund to the IEPF Authority by submitting an online application in Form lEPF-5 available on its website (www.iepf.gov.in) along with the fee specified by the IEPF Authority, from time to time.

(b) Upon submission, Form IEPF-5 shall be transmitted online to the Nodal Officer of the Company for verification of claim.

The claimant after making an application in Form IEPF-5 shall send updated Client Master List along with Indemnity Bond, Advance Receipts, other documents as enumerated in Form IEPF-5 duly signed by him, to the Nodal Officer of the Company at its registered office for verification of the claim.

(c) The Nodal Officer shall, within 30 (thirty) days from the date of receipt of claim, send an online verification report to the IEPF Authority after verification of details in Form IEPF-5.

(d) The claim will be verified by the IEPF Authority, and they may request additional documents or information, a if necessary.

(e) The IEPF Authority will initiate the refund process if the claim is verified and approved, and the amount will be credited to the claimant's bank account.

## 8. MAINTENANCE OF RECORDS

The Company shall preserve information pertaining to the unclaimed amounts of investor(s) including relevant documentation and furnish necessary information, as and when called by the SEBI.

## 9. DISPLAYING OF CLAIMS DETAILS ON WEBSITE

The Company shall display the cumulative details of the number of claims received, processed, pending, etc. on its website and any change in the information uploaded on the website shall be updated monthly by the Company by 7$^{th}$ day of the succeeding month.

## 10.VALIDITY

This policy shall be valid till the Company is a listed entity in terms of Listing Regulations.

In the event of any conflict between this Policy and the applicable law(s), the provisions of applicable laws shall prevail.

The policy shall be reviewed annually or earlier if required by RBI regulatory or internal/external changes.

**Annexure A**

| ISIN | Amount lying unclaimed (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 or any other account for the purpose (dd/mm/yyyy) | Date when amount is to be transferred to IEPF (dd/mm/yyyy) |
|---|---|---|---|---|---|---|
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | **Total** | | | | | |

**Name and designation of the Nodal Officer:**

**Email ID and phone no.:**

**Annexure B**

Format for submitting claim:

| | |
|---|---|
| Name of Investor/s | |
| DP ID / Client ID | |
| International Securities Identification Number (ISIN)/s | |
| Category of investor (Corporate/ Entity / Individual etc.) | |
| Capacity in which investor is submitting claim (Self/ Legal Heir/ Nominee etc.) | |
| Details of unclaimed amount against each ISIN | |
| Number of days in within which the claim is being submitted post completion of 30 days from the due date | |
| PAN of the Investor | |
| Proof of Identity | |
| Address including proof of address | |
| Proof of holding security | |
| Manner of submission<br>(Hard copy/ Scanned copy through email) | |
| Email ID | |
| Contact Details/ phone no. | |
| Bank details (Bank account number, Name of Bank, IFSC Code, Branch address) in which amount to be transferred/refunded | |
| Any other relevant information | |

Enclosures:

1. Self-attested copy of PAN;
2. Self-attested copy of address proof;
3. Cancelled cheque;
4. Updated Client Master List;
5. Self-attested copy of Passport/OCI card/ PIO card (for Foreigners/ NRI).
6. ISR-1 & 2 along with the supporting documents

In case claim made by legal heir (without nomination), additional documents as mentioned in the policy.