



**POLICY FOR CLAIMING UNCLAIMED  
AMOUNT ON NON-CONVERTIBLE  
SECURITIES  
Version 1.0**

### **Statement of confidentiality**

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### **Document Control**

<b>Description</b>	<b>Name</b>	<b>Date</b>
Author	Ms. Nikita Nath	08.02.2024
Reviewed By	Mr. Satish Nair	08.02.2024
Approved By	Board of Directors	08.02.2024

## 1. PREAMBLE:

1.1. This Policy has been framed by the Company pursuant to the requirements of Regulation 61(A) (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) read with Securities and Exchange Board of India Circular **SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176** dated November 08, 2023.

1.2. The Board of Directors (the “Board”) of Vastu Finserve India Private Limited (“VFIPL” or “Company”), adopts this Policy effective from March 1, 2024.

## 2. PURPOSE:

2.1. This policy specifies the process for dealing with unclaimed amounts i.e. Interest and/or Redemption amount lying with the Company (having listed non-convertible securities) including the steps to be undertaken by the Company for processing claims of investors.

2.2. Non-convertible securities shall mean the non-convertible debentures issued in past and future issuance to be made by the Company from time to time and any other securities as specified by the SEBI.

## 3. APPLICABILITY:

3.1. This Policy shall apply to the Company having Listed non-convertible securities with interest/ redemption amount which has not been claimed within thirty days from the due date of interest / redemption payment.

## 4. OBLIGATION OF THE COMPANY:

4.1. **Transfer of unclaimed amounts to Escrow Account:** In terms of Regulation 61A (2) of the SEBI LODR Regulations:

4.1.1. Within seven days from the date of expiry of the thirty days the Company shall be required to transfer the unclaimed amounts to an Escrow Account to be opened by the Company with any scheduled bank.

4.1.2. 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’ constituted as per Section 125 of the Companies Act, 2013.

- 4.2. **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 applicable 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.
- 4.3. **Designating Nodal Officer:** The Company shall designate a person as 'Nodal Officer', who may either be a Director, Chief Financial Officer, Company Secretary or Compliance Officer of the Company who shall be the point of contact for investors entitled to claim their unclaimed amounts, SEBI, Stock Exchange(s) and Depositories. The Company shall display the name, designation and contact details of the Nodal Officer on its website. 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.
- 4.4. **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.
- 4.5. **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.
- 4.6. **Information of unclaimed amount:** Upon search, the investor(s) will be able to view the following information:
- 4.6.1. Amount due to the investor on the date of payment (in INR).
  - 4.6.2. Category – interest / redemption amount.
  - 4.6.3. Date when amount became due (dd/mm/yyyy).
  - 4.6.4. Amount (in INR) transferred to Escrow Account (including penal interest, if any, for delay in transfer by the Company);
  - 4.6.5. Date when unclaimed amount was transferred to Escrow Account(dd/mm/yyyy).
  - 4.6.6. Interest, if any, in the Escrow Account, that accrues to the investor in proportion to his/ her unclaimed amount.

## 5. PROCESS OF CLAIMING UNCLAIMED AMOUNTS BY INVESTORS:

- 5.1. **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.

- 5.2. **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.
- 5.3. **Supporting Documents:** The claim form shall accompany supporting documents i.e. proof of identity, address proof, proof of holding etc.
- 5.4. **Manner of submission of claim:** The investor can submit their claim physically addressed to the Nodal Officer, Vastu Finserve India Private Limited - Unit Nos. 203 & 204, 2nd Floor, A Wing, Navbharat Estate, Zakaria Bunder Road, Sewri (West), Mumbai - 400 015 or over the e-mail at email ID provided at the website of the Company. ([nikita.nath@vastuhfc.com](mailto:nikita.nath@vastuhfc.com)).
- 5.5. **Timeline:** Where the interest/ redemption amount has not been claimed within 30 days from the due date of payment, Company shall within 7 days transfer the unclaimed amount to escrow account and the Investors can submit their claims with Company w.r.t. unclaimed amount, post expiry of 30 days from the due date of payment. In case the Company requires further information or clarification, regarding the unclaimed amount and matters connected thereto, the investor shall, provide the necessary information/ clarifications within the specified timeline.
- 5.6. **Conditions for rejection / option of re-filing of claim:** 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 email 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.
- 5.7. **Timeline for processing of Claim:** 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.
- 5.8. **Contact Details:** Investor can raise their queries or grievances, if any, relating to their claim by contacting on email ID and phone number as specified on the website of the Company ([nikita.nath@vastuhfc.com](mailto:nikita.nath@vastuhfc.com)).
- 5.9. **Website:** This policy shall be displayed on the website of the Company. ([www.vastufinserve.com](http://www.vastufinserve.com)).

**6. INTERNAL PROCESS TO BE FOLLOWED BY COMPANY FOR VERIFICATION OF CLAIMS, DOCUMENTS ETC. IN CONNECTION WITH CLAIM BY INVESTOR:**

- 6.1. **Process for verification of claim, documents etc.:** Upon receipt of a claim application/ request from investor, the Company shall initiate the process for verification and status of Claim including verifying the documents submitted by self, including legal heir/nominee etc.
- 6.2. **Right to seek further information/ clarification for processing or rejection of claim:** Upon examination, If the Company finds it necessary to call for further information/clarification 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 and direct such 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 will not debar an investor/s from filing a fresh claim.
- 6.3. **Timeline for processing of Claim:** 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.
- 6.4. **Maintenance of Records:** The Company shall preserve information pertaining to the unclaimed amounts of investor(s) including relevant documentation as guided by SEBI and furnish necessary information, as and when called by the SEBI.
- 6.5. **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 on an ongoing basis by the Company.

**7. VALIDITY:**

- 7.1. This policy shall be valid till the Company is a listed entity in terms of Listing Regulations.
- 7.2. In the event of any conflict between this Policy and the applicable law(s), the provisions of applicable laws shall prevail.

**8. EFFECTIVE DATE:**

- 8.1. This policy shall be effective from March 1, 2024.

**9. AUTHORITY TO AMEND THE POLICY:**

9.1. Whole Time Director of the Company is authorized to make modifications / amendments to this Policy which may be required to bring the Policy in line with any regulatory/ statutory changes/ amendments and which to remove ambiguities, enhance clarity on the provisions of the Policy etc. Any major modification to the Policy will require authorization of the Board of Directors. Any Statutory amendment(s) shall be implemented by the Nodal Officer with immediate effect.

9.2. This policy has been approved by the Board of Directors of the Company.

**“Annexure A”**

<b>ISIN</b>	<b>Amount lying unclaimed (Including penal interest, if any) (in INR)</b>	<b>Category (Interest/Redemption amount)</b>	<b>Date when amount became due (dd/mm/yyyy)</b>	<b>Date when unclaimed amount was transferred to Escrow Account (dd/mm/yyyy)</b>	<b>Date when amount is to be transferred to IPEF (dd/mm/yyyy)</b>

**Details of Nodal Officer:**

Name of the Nodal Officer: Ms. Nikita Rajesh Nath  
 Designation: Company Secretary and Compliance Officer  
 Email ID: [nikita.nath@vastuhfc.com](mailto:nikita.nath@vastuhfc.com)  
 Contact no.: 022-35286711



**“Annexure B”**

**Format for submitting claim under Regulation 61A(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended from time to time):**

Name of Investor/s	
DP ID / Client ID	
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 (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/refund	
Any other relevant information	

**Enclosures:**

1. Declaration that above claim has not been made earlier.
2. Copy of PAN, proof of identity, proof of address, proof of holding of non-convertible securities/ demat account statement, of investor.
3. Cancelled cheque for the bank account of the listed entity where payment is to be made.
4. Affidavit / other legal valid document in case of submission made by legal heir.