

**MANAPPURAM HOME FINANCE LIMITED (MAHOFIN)****POLICY FRAMEWORK ON DEALING WITH AND THE MANNER OF CLAIMING UNCLAIMED AMOUNT OF SECURED REDEEMABLE NON-CONVERTIBLE DEBENTURES (“NCDS”) BY INVESTORS**

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Contents

1. PREAMBLE-	3
2. DEFINITIONS	3
3. INTIMATION TO THE INVESTORS	4
4. POLICY AND PROCESS FOR TRANSFER TO TRUSTEE ACCOUNT AND IEPF ACCOUNT	4
5. OBLIGATION OF THE ENTITY	4-5
6. PROCESS FOR CLAIMING UNCLAIMED AMOUNT	5 -6
7. POLICY REVIEW	6
8. BOARD'S APPROVAL	6



1. PREAMBLE

The Board of Directors (“**The Board**”) of Manappuram Home Finance Limited (“**the Company**”) has adopted the following policy and procedures on transfer of Unclaimed Amount to Investor Education and Protection Fund (IEPF) in line with the SEBI Circular SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 08, 2023. The said circular mandates the entities to adopt a standard process to be followed for transfer of unclaimed amount and the manner of claiming the said amount by the investors.

This Policy shall be applicable to the Company with effect from 01st March, 2024, and all the amendments to the policy shall apply to the company from time to time.

2. DEFINITIONS

- i. **Public Issue NCDs** means Non-Convertible Debenture issued by way of public issue which are listed and rated.
- iv. **Unclaimed Amount** includes unclaimed / unpaid maturity amount and/or interests.
- v. **RTA** means Registrar and Transfer Agents
- Vi **IEPF** means Investor Education and Protection Fund



3. INTIMATION TO THE INVESTORS

Company will play a pro-active role in finding the whereabouts of the NCD holders whose matured amount or interests have remained unpaid, thereby reducing the unpaid matured amounts.

Investors will be intimated by the RTA/Company on payment of maturity amount or interest, through E-mail, Short Messaging Service (SMS) through phone in the last available contact number with the details of transfer.

4. POLICY AND PROCESS FOR TRANSFER TO ESCROW ACCOUNT AND IEPF ACCOUNT

- 1) Where the interest/redemption amount has not been claimed within thirty days from the due date of interest/redemption payment, within seven days from the date of expiry of the said period of thirty days, amount will be transferred to an escrow account to be opened by the listed entity in any scheduled bank:

Provided that the interest/redemption amount that is unclaimed and outstanding for a period of less than seven years as on the date of notification of this sub-regulation shall be transferred to the escrow account within thirty days, where it shall remain for the intervening period up to seven years.

- 2) Any amount transferred to the escrow account that remains unclaimed for seven years shall be transferred to the 'Investor Education and Protection Fund' constituted in terms of section 125 of the Companies Act, 2013

5. OBLIGATIONS OF THE ENTITY

- a) Transfer of unclaimed amounts to Escrow Account: In terms of Regulation 61A (2) of the LODR Regulations, the listed entity shall, within seven days from the date of expiry of the said period of thirty days, transfer the unclaimed amounts to an Escrow Account to be opened by it in any scheduled bank.
- b) Interest in case of default: In case a default is made in transferring the amount referred in paragraph 1 above or part thereof to the Escrow Account of the listed entity, it shall pay, interest on the amount that has not been transferred to the said account, for the period of default i.e. from the date of default till the date of transfer to the Escrow Account, at the rate of twelve percent per annum. The said interest amount shall accrue to the investors in proportion to the amount remaining unclaimed.
- c) Designating Nodal Officer: The listed entity shall designate as 'Nodal Officer', a person who may either be a Director, Chief Financial Officer, Company Secretary or Compliance Officer of the listed entity. Such officer shall be the point of contact for investors entitled to claim their unclaimed amounts, SEBI, Stock Exchange(s) and Depositories. The listed entity 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 listed entity shall designate another person as a Nodal Officer within fifteen days of such change.

- d) Display of information w.r.t. unclaimed amounts by listed entity on its website: The listed entity, shall, within a period of thirty days of transferring the unclaimed amount to the Escrow Account, upload details on its website in the format provided in **Annexure A**.
- e) Search facility for investor: The listed entity shall provide a search facility on its website for investors to verify if there is any unclaimed amount due to them and lying in the Escrow Account of the listed entity. The search criterion may be based on combinations, such as:
 - i) PAN and Date of birth; or
 - ii) Name and Depository Participant Identification (DP ID)/ Client Identification (Client ID).
- f) Information of unclaimed amount: Upon such search, the following information shall be visible to the investor:
 - i) Amount due to the investor on the date of payment (in INR);
 - ii) Category - interest/ dividend/ redemption amount.
 - iii) Date when amount became due (dd/mm/yyyy);
 - iv) Amount (in INR) transferred to Escrow Account (including penal interest, if any, for delay in transfer by the listed entity);
 - v) Date when unclaimed amount was transferred to Escrow Account (dd/mm/yyyy);

Further, the interest, if any, in the Escrow Account, that accrues to the investor in proportion to his/ her unclaimed amount, may also be disclosed by the listed entity.

6. PROCESS FOR CLAIMING UNCLAIMED AMOUNT

Amount lying in the escrow account.

Where the interest / redemption amount has not been claimed within thirty days from the due date of interest/ redemption payment, the company will transfer the amount to an escrow account to be opened with any scheduled bank.

If any investor approaches the company for the amount transferred to unclaimed account, upon the Verification of the authenticity of the claim by the company.

- Issue of account payee cheque by Debenture Trustee or crediting of amount through NEFT by Secretarial department of the company;

Amount transferred to IEPF.

The person in respect of whom any amount is transferred to the IEPF, can make an application by filing Form IEPF-5 with the IEPF authority set up by MCA that shall further process the application. Application can also be made by any legal representative of the deceased person.



IEPF authority may seek necessary clarifications from the concerned company/bank.

If any investor approaches the company for the amount transferred to IEPF, the following procedures are to be followed:

- Form IEPF-5 is required to be filed pursuant to sub-section (3) of section 125 of the Companies Act, 2013 and rule 7(1) of the Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016 (Form IEPF-5 is available on <https://www.iepf.gov.in/IEPF/corporates.html>)
- Upon submission, Form No. IEPF-5 shall be transmitted online to the Nodal Officer of the company for verification of claim.
- claimant after making an application in Form No. IEPF-5, shall send original debenture certificate, along with Indemnity Bond, Advance Receipts, any other document as enumerated in Form No. IEPF-5, duly signed by him, to the Nodal Officer of the concerned company at its registered office for verification of the claim.
- The Nodal officer will file a verification report after the verification of claim.

7. POLICY REVIEW

This policy shall be subject to review as may be deemed necessary by the Board and to comply with any regulatory amendments or statutory modifications and subject to the necessary approvals of the Board of Directors.

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 (dd/mm/yyyy)	Date when amount is to be transferred to IEPF (dd/mm/yyyy)