

MANAPPURAM FINANCE LIMITED (MAFIL)
POLICY FRAMEWORK ON DEALING WITH AND THE MANNER
OF CLAIMING UNCLAIMED AMOUNT OF SECURED
REDEEMABLE NON-CONVERTIBLE DEBENTURES ("NCDS") BY
INVESTORS

Version Control		
Version Number	Description	Date
Version 1	New Policy	07.02.2024
Version 2	Renewal	20.03.2025

Effective Date : 20-03-2025

Next Review Date : 20-03-2026

Policy Owner : Secretarial department

Prepared By : Secretarial department

Reviewed by : MAFIL Policy Review Committee

Approved by : Board of Directors

1. PREAMBLE

The Board of Directors (“**The Board**”) of Manappuram Finance Limited (“**the Company**”) has adopted the following policy and procedures on transfer of unclaimed amount to escrow account and then to Investor Education and Protection Fund (IEPF) in line with the SEBI Circular SEBI/HO/DDHS/DDHSRAC-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.

2. DEFINITIONS

- i. **Public Issue NCDs** means Non-Convertible Debenture issued by way of public issue which are listed and rated.
- ii. **Unclaimed Amount** includes unclaimed / unpaid maturity amount and/or interests.
- iii. **RTA** means Registrar and Transfer Agents.
- iv. **IEPF** means Investor Education and Protection Fund.
- v. **Retail NCDs** means Non-Convertible Debenture issued by way of private placement by the company which are neither listed nor rated.
- vi. **Institutional NCDs** means Non-Convertible Debenture issued by way of private placement through or to Institutional mode which are listed and rated.

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 or 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, then within seven days from the date of expiry of the said period, the amount will be transferred to an escrow account opened by the company 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 subregulation 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 company shall, within seven days from the date of expiry of the said period of thirty days, transfer the unclaimed amounts to an Escrow Account 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 'a' above or part thereof to the Escrow Account of the company, 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 company shall designate as 'Nodal Officer', a person who may either be a Director, Chief Financial Officer, Company Secretary or Compliance Officer of the company. Such officer 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 fifteen days of such change.
- d) Display of information w.r.t. unclaimed amounts by the company on its website: The company, shall, within a period of thirty days of transferring the unclaimed

amount to the Escrow Account, upload details on its website in the prescribed format.

e) Search facility for investor: The company 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 company. 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 company);
- 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 company.

g) Maintenance of records: The company shall preserve information pertaining to the unclaimed amounts of investors including relevant documentation. The company shall furnish necessary information, as and when called for by the Board.

h) Update of information: Any change in the information uploaded on the website shall be updated by the company by the seventh day of the succeeding month.

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 opened with any scheduled bank.

However, the investor can claim back the amount from the escrow account by following below procedures:

- In case if debentures were held in physical form, the investors shall produce the below mentioned documents in order to process their request for revalidation through electronic mode:

1. Duly signed request letter.
2. Original cancelled cheque leaf for all the registered security holders. The original cancelled cheque leaf bearing the name of the first holder is mandatory, failing which first security holder shall submit the copy of bank passbook / statement attested by the Bank.
3. Self-attested copy of PAN Card of the first security holder (front & back).

In case the signature has changed over the period of time, the investors shall send the ISR- 2 form and the original cancelled cheque leaf along with above mentioned documents.

- In case if debentures were held in Demat form, the current bank details should have to be updated with the depository participant and then the updated client master list should be forwarded along with duly signed request letter.

The relevant Forms ISR-1, ISR-2, ISR-3, SH-13, SH-14 are available on the RTA's website <https://web.in.mpms.mufg.com/KYC-downloads.html>

The above documents need to be lodged with the Registrar & Transfer Agents at the below mentioned address:

MUFG Intime India Private Limited
Unit:- Manappuram Finance Ltd - Bond
C-101, Embassy 247, L.B.S. Marg
Vikhroli (West)
Mumbai – 400 083

In case of deceased investors, the legal heir/nominee shall comply with the transmission procedure with the depository participant and shall submit the following additional documents to process the interest/redemption payment in the name of the legal heir or nominee.

1. Request letter duly signed by registered nominee / legal heir.
2. Updated Client Master List (CML copy) of registered nominee / legal heir .
3. Client Master List (CML copy) of deceased holder .

4. Holding cum transaction of the above mentioned demat account.
5. Notarized death certificate of deceased holder.

From the day following the day the interest or redemption amount was sent to the escrow account until the day before the money will be transferred to the IEPF, investors may assert their right to receive their money back from the escrow account.

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 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.

The company shall within thirty days of receipt of a valid claim application and requisite documents from an investor as called upon from the investor, remit the payment to the investor using electronic modes of funds transfer.

In case of any queries/ grievances the investor can contact the nodal officer whose details are specified as follows:

Mr. MANOJ KUMAR V.R

Company Secretary & Compliance Officer

Email : cs@manappuram.com ,cosecretary@manappuram.com

Phone – +91 487 3050413 / 417

The company shall display the cumulative details of the number of claims received, processed, pending, etc. on its website.

Amount transferred to IEPF.

The person whose unclaimed 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. (Login to MCA website [\[FO Login \(mca.gov.in\)\]](https://mca.gov.in) and access IEPF-5 Web Form under *MCA Services-IEPF related services*).
- 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.

8. Repeal

Any earlier policy of the company in this subject shall stand repealed from the date of coming into force of this policy

Part B
Retail NCD & Institutional NCD

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.

Retail NCDs

Investors may be contacted through E-mail, Short Messaging Service (SMS), phone or through registered post/ordinary post in the last available contact number or last available address for correspondence before and after the automatic settlement of maturity amount through RTA or by the Company directly.

Institutional NCDs

Investors should be contacted through phone, registered post or e mail, as per the availability, by the HO Employees after the automatic settlement of maturity amount or interest payment.

PROCESS FOR CLAIMING UNCLAIMED AMOUNT

Retail NCDs

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

- i. Debenture Certificate, Trustee Form, Address Proof (PAN, Voters ID Card, Passport) Bank Details and a Request Letter to be collected from investor through branch;
- ii. Verification of the authenticity of the claim by the Secretarial department of the company;
- iii. Issue of account payee cheque by Debenture Trustee or crediting of amount through NEFT by Secretarial department of the company.

Institutional NCDs

The procedure as specified in the offer document or as instructed by Debenture trustee will be followed in respect of the unclaimed amount.

POLICY AND PROCESS FOR TRANSFER TO TRUSTEE ACCOUNT AND IEPF ACCOUNT

Retail NCDs

Procedures to be followed by the company are:

- i. For NEFT updated cases, NCDs will be settled on Maturity date automatically.
- ii. In case NEFT not updated, maturity proceeds have to be transferred to HO account on the next day of maturity date and NEFT will be initiated after collecting bank details from the customer within 60 days of maturity date.

All unclaimed amount to be transferred to the IEPF Authority as specified in the IEPF Rules shall be transferred within thirty days from the completion of seven years from the maturity date and concerned form shall be filed with ROC.

Institutional NCDs

The unclaimed amount in respect of NCD Privately Placed - Institutional are to be transferred to Escrow account or to the account be maintained as per the terms of the issue.

All unclaimed amount to be transferred to the IEPF Authority as specified in the IEPF Rules shall be transferred within thirty days from the completion of seven years from the maturity date and concerned form shall be filed with ROC.