



**POLICY FOR DEALING WITH UNCLAIMED AMOUNTS WITH RESPECT TO LISTED
NON-CONVERTIBLE SECURITIES AND MANNER OF CLAIMING SUCH AMOUNTS BY
INVESTORS**

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Approver	Board of Directors
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Policy Owner	Secretarial Department
Signed By	Vikas Gupta, Company Secretary and Chief Compliance Officer

Version History :

Version	Date	Author(s)	Reviewer
1	22.03.2024	Secretarial	Company Secretary & Chief Compliance Officer



SATIN CREDITCARE NETWORK LIMITED

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1. BACKGROUND

Regulation 61A (2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') as amended, provides that, *'where the interest/ dividend/ redemption amount for listed non-convertible securities has not been claimed within thirty days from the due date of interest/ dividend/ redemption payment, a listed entity shall within seven days from the date of expiry of the said period of thirty days, transfer the aforesaid unclaimed amount to an Escrow Account, where it shall remain for the intervening period upto seven years'*.

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 a) by investors for claiming respective unclaimed amounts and b) for verification of claims including the documents to be taken into account, facility to check status of claim by investor, etc., shall be formulated by all applicable companies.

Accordingly, the Board of Directors of Satin Creditcare Network Limited ('the Company') have framed this policy for dealing with unclaimed amounts lying with the Company and the manner of claiming such amounts by investors.

The policy shall be effective from the date of approval of the Board of Directors.

2. PURPOSE

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

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

3. APPLICABILITY

This framework shall be applicable to entities having listed non-convertible securities with interest/ dividend/ redemption amount which has not been claimed within thirty days from the due date of interest/ dividend/ redemption payment.

4. SCOPE AND DEFINITIONS

4.1. Scope

This framework focuses on standardizing the procedure that the Company must follow when transferring unclaimed interest/dividend/redemption amount for Non-Convertible Securities to an Escrow Account, as well as when investors make claims on those funds.

4.2 Definitions

- a) "Act" refers to the Companies Act, 2013 read with Rules made thereunder, as amended from time to time.
- b) "Authority" refers to Investor Education and Protection Fund Authority.



- c) **“Applicable Laws”** refers to the Act, Listing Regulations and relevant SEBI Circulars and any other provisions as may be applicable, as amended from time to time.
- d) **“BENPOS”** refers to the Beneficiary position statement as received from the Registrar and Transfer Agent of the Company on a record date as per the Disclosure Documents.
- e) **“Day(s)”** refers to Calendar days unless otherwise specified.
- f) **“Disclosure Document(s)”** refers to the Information Memorandum / Prospectus / General Information Document / Key Information Document / Placement Memorandum / Term sheet or any other document by whatever name called containing the terms and conditions in relation to the issuance of non-convertible securities.
- g) **“Financial Year or FY”** refers to the Financial Year beginning from April of a year and March of the subsequent year.
- h) **“IEPF”** refers to Investor Education and Protection Fund constituted in terms of Section 125 of the Companies Act, 2013.
- i) **“Listing Regulations”** shall refer to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.
- j) **“Nodal Officer”** shall be the person responsible for handling the queries received from investors, SEBI, Stock Exchange(s) and Depositories as authorized and designated by the Board of Directors of the Company in accordance with the applicable laws.
- k) **“RTA”** refers to the Registrar and Share Transfer Agent of the Company.
- l) **“SEBI”** stands for Securities and Exchange Board of India.
- m) **“Unclaimed Amount”** refers to the Interest / Dividend / Redemption amount on Non-convertible Securities which is due for payment but not claimed by the respective investor(s) within the stipulated period.
- n) **“Year”** refers to Calendar Year unless otherwise specified.

Words denoting the singular shall include the plural and *vice versa*. Words denoting any gender include all genders. Words or phrases used herein and not defined shall have the same meaning as given to such words or phrases in the Act and Listing Regulations as amended from time to time.

5. OBLIGATION OF THE COMPANY

5.1 TRANSFER OF UNCLAIMED AMOUNTS TO ESCROW ACCOUNT:

- 5.1.1. The Company shall make all the payments due to the respective investor(s) as per the BENPOS received from RTA on the due date of payment as per the terms of the Disclosure Document, as the case may be.
- 5.1.2. In case the payment so made to the respective investor(s) on the due date fails due to any of the following reason(s):
- Dormant / NRE bank account provided by the investor
 - Wrong IFSC code provided by the investor
 - Mismatch of name of the investor & name of the bank account holder



- Any other reason

5.1.3. Then the Company shall issue a demand draft in favour of the respective investor(s) and the same shall be sent to the registered address of the respective investor(s) as available in the BENPOS.

5.1.4. In case the demand draft returns unclaimed to the Company due to any of the following reasons:

- Addressee not found
- Addressee refused to collect the package
- Door locked
- Any other reason

5.1.5. Then the Company shall try to reach the concerned investor(s) and shall transfer such interest/ principal amount to the investor(s) within 30 (thirty) days of it being due.

5.1.6. Where any such amount has not been claimed by the investor(s) within 30 days from the due date of payment, the Company shall transfer such unclaimed amount to the Escrow Account to be opened by it in any scheduled bank **within 7 (seven) days from the date of expiry of the said period of 30 (thirty) days i.e within 37 days.**

5.1.7. It may be noted that the amount so transferred to Escrow account shall not bear any interest.

5.1.8. The Company shall publish a list containing the names of the investor(s) and their respective amount(s) lying unclaimed on its website within such time as may be prescribed, from time to time under the applicable laws. Such list shall also contain search facility for ease of access to the investor(s). The cumulative details of the number of claims received, processed, pending, etc. shall also be available on the website of the Company.

5.1.9. In case any amount is not transferred within the aforesaid period (37 days), the Company shall pay interest on such amount 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 or such other rate as may be prescribed, from time to time under the applicable laws. The said interest amount shall accrue to the investors in proportion to the amount remaining unclaimed.

5.1.10 Any amount transferred to the Escrow Account which remains unclaimed for a period of 7 (seven) years from the date of such transfer, shall be transferred to IEPF within a period of 30 (thirty) days.

5.2 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.

5.3 PROCESS FOR CLAIMING UNCLAIMED AMOUNTS BY INVESTORS AND FOR VERIFICATION OF CLAIMS, DOCUMENTS ETC. IN CONNECTION WITH CLAIM BY INVESTOR:

5.3.1. **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 A**" to this Policy.



- 5.3.2. 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.
- 5.3.3 Supporting Documents:** The claim form shall accompany supporting documents i.e. proof of identity, address proof, proof of holding etc.
- 5.3.4. Manner of submission of claim:** The investor can submit their claim physically addressed to the Nodal Officer, Satin Creditcare Network Limited, Plot No. 492, Udyog Vihar, Phase-III, Gurugram-122006 or over the e-mail at email ID provided at the website of the Company (www.satincreditcare.com).
- 5.3.5. Timeline:** Where the interest/ dividend/ redemption amount has not been claimed within 30 days from the due date of payment, the Company shall within 7 days post expiry of 30 days from the due date of payment, transfer the unclaimed amount to escrow account and the Investors can submit their claims with Company w.r.t. unclaimed amount. 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.
- 5.3.6. 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 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.
- 5.3.7. 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.
- 5.3.8. 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 i.e. www.Satincreditcare.com.

For Non-convertible Debentures, investor may contact to our RTA:

KFin Technologies Limited

Selenium Tower B, Plot No 31 & 32

Gachibowli, Financial District,

Nanakramguda, Serilingampally

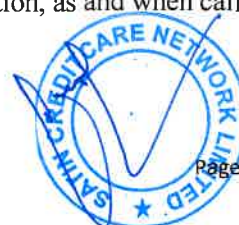
Hyderabad – 500 032

Email Id: einward.ris@kfintech.com

Tel: (040) 6716 2222

In case the complaint is not resolved within the given time or if the investor of Non-convertible Debentures is not satisfied with the solution provided by RTA, then he/she can approach to the Company @ Tel.: (0124) 4715400; Email: secretarial@satincreditcare.com.

- 5.3.9. 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.



5.3.10. 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 a monthly basis by the Company by 7th day of the succeeding month.

5.6. PROCESS FOR CLAIMING UNCLAIMED AMOUNTS BY INVESTORS FROM IEPF:

5.6.1. Any person who wishes to claim unclaimed amounts from IEPF may claim the same as per the provisions of Section 125 of the 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 following the below procedure:

Step 1: The Investor to visit the website of IEPF Authority www.iepf.gov.in and fill & submit e-form IEPF – 5 alongwith fee specified by the Authority from time to time in consultation with the Central Government.

Step 2: The Investor to take print of the e-form IEPF – 5 and submit original application with the required documents duly self-attested (including the joint holder) to the Company at its Corporate Office situated at Plot No. 492, Udyog Vihar, Phase-III, Gurugram – 122016, Haryana addressed to Nodal Officer.

Step 3: The Company will verify the details of the claim and various documents submitted by the shareholder and submit the original documents with enclosures received from the Investor/Claimant with Verification Report to IEPF Authority.

Step 4: On the basis of Verification Report and the documents submitted by the Company, IEPF Authority, would:

- i) Approve the claim; or
- ii) Ask the Investor to resubmit the required documents in case of any discrepancy.

Step 5: In case IEPF Authority requests the investor to resubmit any documents, Investor to forward the required documents to the Nodal Officer. On receipt of the revised documents from the Investor, Nodal Officer would forward the revised Verification Report to IEPF Authority for settlement of the claim of the Investor.

In case the claim is rejected by the IEPF Authority, the Investor to follow the Step 1-4 stated above

6. REVIEW

This Policy will be reviewed and updated from time to time. All updates and revisions will be approved by the Board of Directors of the Company.



“Annexure A”

Format for submitting claim under Regulation 61A(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

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.



