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# **POLICY FOR CLAIMING UNCLAIMED AMOUNT ON NON-CONVERTIBLE SECURITIES**

Version 1.0 approved by the Board of Directors on 25<sup>th</sup> October, 2024

## **PREAMBLE**

Regulation 61A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations") provides for dealing with unclaimed Non-Convertible Securities ("NCS") and benefits accrued thereon.

Where the interest/dividend/redemption amount for Non-Convertible Securities has not been claimed within thirty days from the due date of interest / redemption payment, the Company shall within seven days from the date of expiry of the said period of thirty days, transfer the amount to an escrow account to be opened in any scheduled bank.

This Policy has been formulated as per Circular No. SEBI/HO/DDHS/DDHS-RAC1/P/CIR/2023/176 dated November 8, 2023, issued by SEBI ("SEBI Circular") on Procedural framework for dealing with unclaimed amounts lying with entities having listed Non-Convertible Securities and manner of claiming such amounts by investors.

## **APPLICABILITY:**

This Policy applies in respect of listed non-convertible securities, wherein interest/dividend/redemption amounts remain unclaimed for thirty days from the due date of payment.

## **NODAL OFFICER:**

In order to address Investor's grievances, Nodal Officer for this purpose will be the Company Secretary. The Nodal officer shall be the point of contact for the Investors for grievances, if any, relating to their claim, SEBI, Stock Exchange(s) and Depositories.

## **OBLIGATION OF THE COMPANY:**

Transfer of Unclaimed Amounts to Escrow Account: Unclaimed amounts in respect of listed non-convertible securities will be transferred to an Escrow Account with a scheduled bank within seven days from the expiry of thirty days from the due date of payment.

Unclaimed amounts remaining in the Escrow Account for seven years are to be transferred to the 'Investor Education and Protection Fund' as per Section 125 of the Companies Act, 2013.

Interest in Case of Default: Failure to transfer unclaimed amounts to the Escrow Account would result in the Company paying 12% p.a. interest on the outstanding amount for the period of default which shall accrue to the investors in the proportion of the amount remaining unclaimed.

## **PROCEDURE FOR CLAIMING THE UNCLAIMED INTEREST / REDEMPTION AMOUNT**

1. Investors / Beneficiaries can approach the company directly or through an intermediary (trustee, RTA, brokers, etc) via email, phone etc., for claiming the unclaimed /rejected/ returned amounts.
2. Investors / Beneficiaries shall share the details of the unclaimed amounts to the company for tracing the amount / claim due to them. Alternatively, the investors / beneficiaries can also check whether any unclaimed interest/ principal is due to be payable to them from the details uploaded by the Company on its website.
3. Investors / Beneficiaries may claim their amount by filing a form provided as per Annexure I of the Policy with the company or with the Registrar and Transfer Agent (RTA) of the Company "Link Intime India Private Limited" for release of unclaimed amounts. Upon receipt of a claim submitted by the Investors / Beneficiaries, the company or the RTA will check the correctness of the documents and shall process the claim within 30 days from the date of receipt of complete information as called from the investor.
4. If at the time of the claim by beneficiaries, the company finds the documents or details submitted by the beneficiary to be unsatisfactory or that the details shared by the beneficiary, do not match with the records of the company, then the company at its discretion, reject such claim or ask for additional clarifications and/or proofs, documents etc.
5. The investors can contact via email, phone or written letters to the company, or to the Trustee, or to RTA or to the brokers, or any other third-party intermediary for query relating to the claim.
6. The list of documents required to be submitted by the beneficiaries in support of the claim

### **Claim by beneficiary / Investor:**

- a) Self-attested copy of PAN;
- b) Self-attested copy of Address Proof;
- c) Certified copy of the updated Client Master List (CML) with revised/correct bank details
- d) Cancelled Cheque from the same bank account which is getting reflected in the revised CML
- e) Self-attested copy of Passport/OCI card/ PIO card (for Foreigners/NRI)\*
- f) ISR-1 & 2 along with the supporting documents (the copy of forms is available on the website of the Company at <https://www.smcindiaonline.com>)

*\*In case of institution/Body Corporates provide copy of Board Resolution and list of authorised signatories.*

#### **Claim by nominee / legal heir:**

- a) A notarized affidavit from all legal heir(s) made on non-judicial stamp paper of appropriate value. The draft format is annexed to this policy as Annexure C
- 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).
- 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).
- f) In addition, Form ISR-1 & Form ISR-2 along with the supporting documents are required of claimant.

#### **PROCESSING OF CLAIM**

Upon receipt of a claim application, if the RTA upon examination finds it necessary to call for further information or finds such application/document(s) to be defective or incomplete in any respect, it shall intimate the investor about such findings by e-mail or other written communication. The RTA shall direct the investors to furnish such information or rectify such defects or incompleteness or to re-submit 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. The RTA shall within 30 (thirty) days of receipt of a claim application from an investor or complete information as called upon, remit the payment to the investor through electronic transfer. Request for release of such 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 the RTA.

#### **PROCESS OF CLAIMING UNCLAIMED AMOUNT IN CASE WHERE SUCH AMOUNT IS TRANSFERRED TO IEPF**

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

a) Any investor claiming unpaid/unclaimed amount for NCS, shall raise a request with the Company or its RTA on the contact details mentioned under Annexure A, mentioning the Folio number/ Client ID & DP-ID and the period for which the same has not been received/ claimed by attaching the following documents to enable RTA/Company to verify the claim:

- a) Self-attested copy of PAN;
- b) Self-attested copy of Address Proof;
- c) Certified copy of the updated Client Master List (CML) with revised/correct bank details
- d) Cancelled Cheque from the same bank account which is getting reflected in the revised CML
- e) Self-attested copy of Passport/OCI card/ PIO card (for Foreigners/NRI)\*

f) ISR-1 & 2 along with the supporting documents (the copy of forms is available on the website of the Bank at <https://www.smcindiaonline.com/investors>)

*\*In case of institution/Body Corporates provide copy of Board Resolution and list of authorised signatories.*

[In case of any discrepancy/incompleteness of application, the RTA shall re-direct the claimant to provide such information.]

b) Basis the request and verification of supporting documents, the Company shall issue entitlement letter to the claimant within 30 Days of receipt of claim/ satisfactory additional information as called upon.

c) Subsequent to receipt of entitlement letter, the investor may apply for refund to the IEPF Authority by submitting an online application in form IEPF-5 available on the website [www.iepf.gov.in](http://www.iepf.gov.in) along with such attachments and fees as may be prescribed, from time to time.

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

[The claimant after making an application in IEPF-5 shall send updated CML along with Indemnity Bond, Advance Receipts and such other documents as prescribed in Form IEPF-5 duly signed by them, to the RTA / Nodal Officer at the correspondence address of the Company for verification of the claim. In case of any discrepancy/incompleteness of application, the RTA shall re-direct the claimant to provide such information]

e) The Nodal Officer shall, within 30 (thirty) days from the date of receipt of claim/ satisfactory additional information as called upon, send an online verification report to the IEPF Authority after due verification of details in Form IEPF-5.

f) The IEPF Authority shall verify the claim, and then may request additional documents or information if necessary.

g) 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 through electronic transfer.

## **AMENDMENT**

Any amendments in the law, including any clarification/ circulars of relevant regulator, shall be read into this Policy such that the Policy shall automatically reflect the contemporaneous applicable Law at the time of its implementation.

## **REVIEW**

The policy will be modified to be in line with the amendments in the applicable law. The policy shall be reviewed by the Stakeholders Relationship Committee and the Board of Directors from time to time.

## *Annexure A*

To,  
The Nodal Officer  
SMC Global Securities Limited  
[Company Address]

**Date:** [DD/MM/YYYY]

### **Subject: Application for Claiming Unclaimed Interest/Redemption Amount on Non-Convertible Debentures**

Dear Sir/Madam,

I/We, the undersigned, hereby submit a claim for the unclaimed interest/redemption pertaining to my/our Non-Convertible Debentures (NCDs) issued by SMC Global Securities Limited, with the following details:

#### **. Investor Details**

- **Name of Debenture Holder:** [Full Name]
- **No. of Debentures:** [Mention number of debentures held]
- **Folio/DP ID & Client ID:** [Mention Folio or DP ID and Client ID, as applicable]
- **PAN Number:** [PAN of Debenture Holder]
- **Contact Number:** [Phone Number]
- **Email ID:** [Email Address]
- **Address:**  
[Full Address of Debenture Holder]  
[City, State, PIN]

#### **2. NCD Details**

- **Name of the Issue:** [SMC Global Securities Limited NCD Issue]
- **ISIN Number:** [ISIN of NCD]
- **Debenture Certificate/Account Number:** [Number]
- **Category (Interest/Dividend/Redemption):** [Mention category of claim]
- **Amount of Claim (Interest/Redemption):** [Amount in INR]
- **Date of Maturity (for Redemption):** [DD/MM/YYYY]
- **Date when amount became due:** [DD/MM/YYYY]

I/We, request you to kindly release all my unclaimed interest/ principal amount to the bank account as per details provided by me/us.

#### **3. Bank Account Details for Credit of Unclaimed Amount**

- **Account Holder Name:** [Name as per Bank Account]
- **Bank Name:** [Name of the Bank]
- **Branch Name & Address:** [Branch Details]
- **Account Number:** [Account Number]

- **IFSC Code:** [IFSC of Branch]

#### 4. Documents Enclosed

(Please tick the appropriate boxes for enclosed documents)

- Self-attested copy of PAN Card
- Self-attested copy of Aadhaar Card/Address Proof
- Copy of NCD Allotment Letter/Certificate
- Cancelled Cheque for Bank Account Proof
- Indemnity Bond (if applicable)
- Any other supporting documents (Specify): \_\_\_\_\_

#### 5. Declaration

I/We hereby declare that the information provided in this form is true and correct to the best of my/our knowledge. I/We further declare that I/we have not received the said amount(s) previously and undertake to indemnify SMC Global Securities Limited in case of any future claims made for the same amount.

#### Signature of Debenture Holder(s):

1. \_\_\_\_\_
2. \_\_\_\_\_

**Place:** [City]

**Date:** [DD/MM/YYYY]

**Annexure B**

**Contact Details for Submission of claim and Investor Grievance/Queries**

SMC Global Securities Limited	Link Intime India Private Limited
Name- Mr. Suman Kumar Email Address - <a href="mailto:sumankumar@smcindiaonline.com">sumankumar@smcindiaonline.com</a> Address: 11/6B, Shanti Chamber, Pusa Road, New Delhi – 110005 Ph: 011-30111333	Address - Noble Heights, 1st Floor, Plot no. Nh2, LSC, C-1 block, Near Savitri Market, Janakpuri, New Delhi-110058 E-mail id - <a href="mailto:bonds.helpdesk@linkintime.co.in">bonds.helpdesk@linkintime.co.in</a> Website - <a href="http://www.linkintime.co.in">www.linkintime.co.in</a>
IEPF Authority Contact number- 1800 114 667 E-mail ID- <a href="mailto:iepfgrivances@mca.gov.in">iepfgrivances@mca.gov.in</a> Address- Ground Floor, JeevanVihar Building, 3, Sansad Marg, New Delhi – 110001	

*Annexure C*

**AFFIDAVIT**

(For claiming unclaimed interest/redemption amounts on non-judicial stamp paper of appropriate value)

**I/We, the undersigned,**

1. **[Name of Legal Heir 1]**, son/daughter of [Father's Name], aged [Age], residing at [Full Address], Aadhaar No. [Aadhaar Number].
2. **[Name of Legal Heir 2]**, son/daughter of [Father's Name], aged [Age], residing at [Full Address], Aadhaar No. [Aadhaar Number].
3. **[Name of Legal Heir 3]**, son/daughter of [Father's Name], aged [Age], residing at [Full Address], Aadhaar No. [Aadhaar Number].  
(Include details for all legal heirs, if applicable)

**do hereby solemnly affirm and declare as under:**

1. That [Name of the Deceased], son/daughter of [Father's Name], was a resident of [Full Address], who passed away on [Date of Death] at [Place of Death], intestate (without leaving a will).
2. That the deceased was entitled to certain interest/redemption amounts related to [Name of the Financial Instrument/NCD/Investment], bearing Account No./Folio No./Certificate No. [Details], which remain unclaimed.
3. That the deceased was survived by the following legal heirs, all of whom are entitled to the interest/redemption amounts:

S. No.	Name of Legal Heir	Relationship with Deceased	Age	Address
1.	[Name]	[Relationship]	[Age]	[Address]
2.	[Name]	[Relationship]	[Age]	[Address]
3.	[Name]	[Relationship]	[Age]	[Address]

4. That we, the legal heirs named above, are the only surviving legal heirs of the deceased, and no other person has any claim to the interest/redemption amounts of the deceased.
5. That we, the undersigned legal heirs, have no objection to the release of the unclaimed amounts to [Name of the Claimant Legal Heir], who is authorized by us to receive the said amount on our behalf.
6. That this affidavit is made to facilitate the release of the unclaimed interest/redemption amounts from SMC Global Securities Limited
7. That whatever stated above is true and correct to the best of my/our knowledge and belief, and nothing material has been concealed herein.
8. That I/We undertake and agree to indemnify and keep indemnified SMC Global Securities Limited, against any and all losses, claims, demands, actions, suits, liabilities, or expenses (including legal costs) that may arise in connection with or as a result of the payment of the unclaimed interest/redemption amounts to the undersigned or the authorized claimant named herein, including, but not limited to, any claims or disputes arising from:



- a) The claim being false or incorrect in any manner, whether due to misrepresentation, concealment of material facts, or any fraudulent action by the undersigned or the authorized claimant;
- b) Any third-party claims or legal proceedings asserting a right to the unclaimed amounts, whether arising from a wilful error in the documentation, false declaration, or any other material misstatement in this affidavit;
- c) Any claim arising from the non-disclosure or concealment of material facts relating to the deceased or the legal heirs, or the nature of the financial instruments involved in the claim.

Further, I/We agree to compensate and reimburse SMC Global Securities Limited for any costs, damages, or legal fees that may be incurred due to the aforesaid claims, disputes, or actions arising from the false claim or concealment of material facts, and I/We shall be solely liable for any such costs, losses, or damages.

**DEPONENT(S):**

(Signature of all legal heirs)

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**VERIFICATION**

I/We, the above-named deponents, do hereby verify that the contents of the above affidavit are true and correct to the best of my/our knowledge and belief. No part of it is false, and nothing material has been concealed therein.

Verified at [City] on this [Day] of [Month], [Year].

**DEPONENT(S):**

(Signature of all legal heirs)

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**Notary Certification**

(Signature & Seal of Notary Public)

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**Documents to be Attached:**

1. Copy of the **death certificate** of the deceased.
2. Copies of **identity proofs** (Aadhaar/PAN) of all legal heirs.
3. Copy of the **investment certificate/statement** showing unclaimed amount details.
4. Proof of **relationship** with the deceased (e.g., family certificate, legal heir certificate, etc.).
5. . Succession certificate (if applicable) or Letter of Administration from the court (in case of complex claims or where applicable).