

## **POLICY FOR DEALING WITH UNCLAIMED INTEREST/ REDEMPTION OF NON CONVERTIBLE SECURITIES**

### **❖ BACKGROUND**

Regulation 61A(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR”), provides that, ‘where the interest/dividend/redemption amount 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 amount to an Escrow Account, and any amount transferred to the Escrow Account in terms of Regulation 61A(2) of SEBI LODR remaining unclaimed for a period of seven years shall be transferred to the Investor Education and Protection Fund constituted in terms of section 125 of the Companies Act, 2013.

Further SEBI vide its circular SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated 8 November 2023 (“the Circular”), has prescribed the procedural framework for dealing with unclaimed interest and redemption amounts lying with entities having listed non-convertible securities and manner of claiming such amounts by investors. The circular requires such companies to formulate a policy specifying the process to be followed by investors for claiming their unclaimed amounts.

Through this framework, the Company is required to ensure that a suitable mechanism exists for transfer of unclaimed amounts to Escrow Accounts and claim thereof by investors.

### **❖ APPLICABILITY**

The Company for the purpose of its business from time to time raises Non- Convertible Debentures (NCDs) on private placement basis. These NCDs are listed on the WDM segment on BSE Limited. This policy provides framework for:

- ✓ dealing with unclaimed interest and redemption amounts, if any arising out of issue of NCDs;
- ✓ ensuring all claims in relation to unclaimed amounts raised by the Investors are resolved on time; and
- ✓ ease of access to information and documents required to claim the unpaid/ unclaimed amount of interest or/and redemption amount on maturity of NCDs or both which they are entitled to claim as per extant regulations.

### **❖ DEFINITIONS**

- a) **Company** means Manba Finance Limited.
- b) **Board** means the Board of Directors of the Company
- c) **Escrow Account** means an existing account and/or new account to be opened by the Company with any scheduled bank to transfer the unclaimed amount with respect to Non-Convertible Debentures.
- d) **Investor** means person/entities who have invested in Company’s non-convertible securities.
- e) **Framework or policy** means the framework for claiming unclaimed amounts by investors of the Company.

- f) **Investor Education and Protection Fund ('IEPF')** means a fund established by the Central Government of India constituted in terms of section 125 of the Companies Act, 2013.
- g) **Unclaimed Amounts** means the amounts which was not claimed within thirty days from the due date of interest/redemption payment.
- h) **Privately placed NCDs** means Non-Convertible Debenture issued by way of private placement which are listed and rated.
- i) **Demat Account No.** means a unique identification number assigned to an individual or entity by a Depository Participant.
- j) **Depository** means an organisation which holds securities of investors in electronic form at the request of the investors through a registered Depository Participant. At present two Depositories viz. National Securities Depository Limited (NSDL) and Central Depository Services (India) Limited (CDSL) are registered with SEBI.
- k) **Depository Participant** means an agent of the depository through which it interfaces with the investor and provides depository services.
- l) **Electronic Transfer** means payment of amount through Direct Credit/NEFT/RTGS/NACH.
- m) **Record Date** means a cut-off fixed by the Company to determine the investors who are eligible to receive interest/ redemption.
- n) **SEBI** means the Securities Exchange Board of India.

❖ **TRANSFER OF UNCLAIMED AMOUNTS TO ESCROW ACCOUNT: NODAL OFFICER**

In case the Interest / Redemption amount was not claimed by the investor within 30 days from the date of payment, the amount will be transferred to an Escrow account in the name of 'Unclaimed Interest / Redemption account' maintained by the Company, within 7 days from the date of expiry of the said period of 30 days.

❖ **SUBMISSION OF CLAIM BY THE INVESTORS**

An investor who intends to claim any unclaimed interest/redemption amount, he is required to submit to the Company the below documents:

**a) In case claim is being submitted by the Investor:**

1. Request Letter (Refer annexure A)
2. Self-attested KYC documents
3. For institutional Investors constitutional documents and scanned copy (PDF/ JPG Format) of the relevant board resolution/authority letter, etc by Authorized Signatories.
4. Certified copy of the updated Client Master List (CML) with revised/correct bank details.
5. Cancelled cheque from the same bank account which is getting reflected in the revised CML.
6. An indemnity bond (Refer annexure B) on non-judicial stamp paper of Rs. 100/-.

**b) In case claim is being submitted by the legal heir/ nominee of the Investor:**

1. Request Letter (Refer annexure A).
2. Self-attested copy of the PAN Card and Aadhaar Card.

3. Original death certificate or copy of death certificate attested by the nominee subject to verification with the original or copy of death certificate duly attested by a notary public or by a Gazetted Officer
4. Certified copy of the updated Client Master List (CML) with revised/correct bank details.
5. Cancelled cheque from the same bank account which is getting reflected in the revised CML.
6. An indemnity bond (Refer annexure B) on non-judicial stamp paper of Rs. 100/-.
7. Individual Affidavits given each Legal Heir (Annexure C)

*Note: The legal heir/ successor/ nominee shall satisfy the conditions/ provisions specified under the SEBI Listing Regulations and circulars issued thereunder, for the transmission of non-convertible securities and/ or the corresponding claim thereon, as applicable.*

Above is an indicative list of documents required for processing the unclaimed interest/redemption amount. The Company reserves its right to seek additional documents on case-to-case basis as it may deem fit in this connection.

#### ❖ **MANNER OF SUBMISSION OF CLAIM BY THE INVESTOR**

Investor shall submit the claim documents personally or through post, at our below mentioned corporate office address :

Ms. Bhavisha Jain  
Company Secretary and Compliance Officer  
Manba Finance Limited  
A-79, Road no 16, Wagle Estate,  
Thane – 400604, Maharashtra  
Tel No.: 022- 62346598  
Email ID: [bhavisham@manbafinance.com](mailto:bhavisham@manbafinance.com)

or he/she can forward claim through email at [investorrelation@manbafinance.com](mailto:investorrelation@manbafinance.com) addressing to the Company Secretary along with required documents, for processing the direct credit of unclaimed interest/ dividend/ redemption amount;

#### ❖ **TIMELINES FOR SUBMISSION OF CLAIM BY THE INVESTOR AND PROCESSING THE CLAIM THEREOF**

- i. Investors to claim interest/redemption amount within 30 days from the due date of interest/redemption payment, failing which the Company shall transfer the amount to Escrow Account within 7 days from expiry of the said period of 30 days.
- ii. Upon receipt of a claim application, the Company, upon examination of the document, if any defective/incompleteness was found, the Company can raise queries/clarification/request for further documents with respect to claim submitted by the investor by the way of letter/email or other written communication.
- iii. 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, the investor can re-submit the claim with the Company with updated document.

- iv. If all documents were in order, the Company shall within 30 days of receipt of a claim application from an investor or complete information as called upon from the investor. Company shall remit the payment to the Claimants' registered bank account using electronic modes of funds transfer.

❖ **WEBSITE UPDATION**

- Display of information w.r.t. unclaimed amounts unclaimed w.r.t. Non- Convertible Debentures, if any.
- Details of the Nodal Officer.
- The cumulative details of the number of claims received, processed, pending, etc. if any.

❖ **TRANSFER TO IEPF**

Pursuant to provisions of Regulation 61A (3) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company shall transfer the amount lying in the Escrow Account, remaining unclaimed for a period of seven years to Investor Education and Protection Fund' ("IEPF") constituted in terms of section 125 of the Companies Act, 2013.

❖ **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.

❖ **REVIEW**

The Stakeholders Relationship Committee of the Board will oversee the implementation of this Policy and any changes, if any in the Policy shall be referred by the Company Secretary to the Committee /Board for its approval.



**Annexure A**

Date: \_\_\_\_\_

To  
Manba Finance Limited  
A-79, Road no 16, Wagle Estate,  
Thane – 400604

Kind Attention: Mr/Ms. \_\_\_\_\_

**Subject:** Credit of the unclaimed interest/principal amount

**Ref:** Non-Convertible Debentures issued by Manba Finance Limited

Dear Sir / Madam,

I/We, \_\_\_\_\_, am/are holding Non-Convertible Debentures (“NCDs”) issued by Manba Finance Limited (“the Company”), as per below details:

Sr. No	Details	Particulars
1.	No. of NCDs	
2.	ISIN	
3.	Amount remaining unclaimed	

I/WE request you to credit the unclaimed amount in the Bank Account, details of which are given as below:

Name of the Bank: \_\_\_\_\_  
Branch: \_\_\_\_\_  
Type of Account: \_\_\_\_\_  
Account Number: \_\_\_\_\_  
IFSC Code: \_\_\_\_\_  
MICR Code: \_\_\_\_\_

Please find enclosed herewith the following documents to enable the Company to process the Unclaimed Amount:

- Self-attested PAN Card Copy and Aadhar Card
- Certified copy of the updated Client Master List (CML) with your correct bank details
- Cancelled Cheque from the same bank account which is getting reflected in the revised CML
- Indemnity Bond

Request you to process the credit of the unclaimed amount.

Thank You.  
Yours faithfully

Sign/-  
Name of Investor  
Address:  
Contact Details:

**Annexure B**

**INDEMNITY BOND**

(To be executed by the Claimant on a non-judicial stamp paper and notarised)

This is to certify and undertake that I/We have lost/misplaced demand draft as per details given below and the same is not traceable in spite of due and diligent search made by me/us for the same:

Name of the Company: **Manba Finance Limited**

Name of the Debenture holder: \_\_\_\_\_

---

No. of NCDs	Demand Draft No.	Interest Amount

I/We hereby agree to indemnify **Manba Finance Limited** in the manner herein after stated.

I/We confirm and undertake that I/We have not encashed, charged, pledged, created any lien or any sort of encumbrance or otherwise dealt in so as to create any adverse claim upon the amount of the Demand Draft.

Now it is hereby agreed that in consideration of the Company credit the said amount in my bank account no. \_\_\_\_\_ with \_\_\_\_\_ bank, I/We hereby for myself/ourselves, my/our heir(s), executor(s), administrator(s) and assign(s) agree to indemnify and save harmless **Manba Finance Limited**, its successors and assigns and the Directors, Employees and Officers thereof and their respective heir(s), executor(s) and administrator(s) and each of their estates and effects from and against all actions, causes, suits, proceedings, accounts, claims and demands whatsoever and against all damages, costs, charges, expenses and sums of money incurred in respect thereof or in relation to the premises aforesaid.

I/We also undertake that if the aforesaid original Demand Draft is/ are hereafter found, then I/We shall return/surrender the said original Demand Draft to the Company for cancellation.

It is hereby further agreed that I/We hereby undertake to produce and return forthwith to the Company the demand Draft when found or traced and to take all actions, suits and proceedings at our own costs, as the Company shall require for the recovery thereof, or otherwise in relation to the said premises.

**IN WITNESS WHERE OF I/WE HERETO HAVE HEREUNTO SET AND SUBSCRIBED OUR RESPECTIVE HAND AT**    **ON**    **DAY OF**   ,   .  
(Place) (Date) (Month) (Year)

<b>Name of the Applicant(s):</b>	<b>Name of the Second Joint Holder</b>	<b>Name of the Third Joint Holder</b>
<b>Signature:</b>	<b>Signature:</b>	<b>Signature:</b>
<b>Address:</b>	<b>Address:</b>	<b>Address:</b>

<b>Name of the Witness no. 1:</b>	<b>Name of the Witness no. 2:</b>
<b>Signature:</b>	<b>Signature:</b>
<b>Address:</b>	<b>Address:</b>

Note: In case of joint holding all the Applicants should sign.

**Annexure C**

**No-Objection Certificate from the Legal Heir(s)**

(NOC from all non-claimants for Transmission of Securities in favour of the Claimant(s) wherein Sole Holder is deceased and No Nomination has been registered)

**DECLARATION**

I/We, the legal heir(s) of late Mr. / Ms. \_\_\_\_\_  
declare as follows:

- i. That the above named deceased holder was holding the following securities in his / her name as single holder:

<b>Name of the Company</b>	<b>Folio No.</b>	<b>No. of securities held</b>

- ii. That the deceased had died intestate on \_\_\_/\_\_\_/\_\_\_ and without registering any nominee.

- iii. That the following Claimant(s) has/have applied for the transmission of the aforesaid securities / interest or / and redemption amount:

<b>Name of the Claimant(s)</b>	<b>Folio No.</b>	<b>No. of securities held</b>

- iv. That I / We are the legal heir(s) of the deceased holder, apart from the Claimant(s) who has / have applied for transmission of the aforesaid securities / interest or / and redemption amount and our details are as follows:

<b>Name of the Legal Heir(s)</b>	<b>Address and contact details</b>	<b>Age</b>	<b>Relationship with the deceased</b>

- v. I / we hereby declare that, I / we do not desire to make any claim in respect of the title to the aforesaid securities held by the deceased and I / we hereby wilfully relinquish & renounce all my /our rights in respect of the aforesaid securities and shall have no legal claim upon said securities in future.

vi. Accordingly, I / we declare that I / we have NO OBJECTION WHATSOEVER in \_\_\_\_\_  
\_\_\_\_\_ (Name of the Company) transmitting the aforesaid securities in favour of  
the Claimant(s) Mr./Ms. \_\_\_\_\_.

vii. I / we hereby state that whatever is stated herein above are true to the best of my/our knowledge and  
nothing has been concealed therein.

Name(s) and Signature(s) of Legal Heir(s) who are Non – Claimant(s):

1) \_\_\_\_\_

2) \_\_\_\_\_

3) \_\_\_\_\_

**VERIFICATION**

We hereby solemnly affirm and state that what is stated herein above is true to our knowledge and  
nothing has been concealed therein and that we are competent to contract and entitled to rights and  
benefits of the above mentioned securities.

Solemnly affirmed at \_\_\_\_\_

Deponent(s) (1) \_\_\_\_\_ (2) \_\_\_\_\_ (3) \_\_\_\_\_