AAVAS FINANCIERS LIMITED



POLICY FOR CLAIMING UNCLAIMED INTEREST/DIVIDEND/REDEMPTION AMOUNT ON NONCONVERTIBLE SECURITIES

1. INTRODUCTION

Pursuant to the Securities Exchange Board of India ("SEBI") circular ref. no. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 08, 2023 ("SEBI Circular") read with SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 ('LODR Regulations'), Aavas Financiers Limited ("the Company") has framed this Policy for defining the process to be followed by the investor to claim the unclaimed Interest/Dividend/redemption amount (Unclaimed Amounts) lying with the company, if any, with regards to the listed non-convertible securities ("NCS") issued by the Company.

2. APPLICABILITY AND PURPOSE

As per the Regulation 61A (2) of the SEBI ("LODR"), 2015 if the amount of Interest/Dividend/Redemption has not been claimed by the investor within thirty (30) days from the due date of payment such unclaimed amount shall be transferred by the company to Escrow account within Seven (7) days from expiry of thirty days.

Further, as per 61A (3) of the SEBI (LODR), 2015 that any amount transferred to the Escrow Account remaining unclaimed for a period of seven years then the company shall transferred such unclaimed amount to Investor Education and Protection Fund ("IEPF") in line with the section 125 of Companies Act, 2013.

The process of claiming Unclaimed Amounts from the IEPF has been prescribed in the Companies Act 2013, this policy is being adopted and implemented to outline the process to be followed by the investors to claim unclaimed amounts from the Escrow account and IEPF.

This Policy will be effective from March 01, 2024 as per the Provisions of the aforesaid Circular with respect to the Unclaimed Amount.

3. **DEFINITIONS**

- **a.** "Act" means the Companies Act, 2013 as amended, modified, supplement, or re-enacted from time to time.
- **b. "Applicable Laws"** means all the applicable statues, acts, laws, ordinances, rules and regulations, binding judgements, decrees or orders issued by any judicial or quasi-judicial authority as in effect from time to time.
- c. "Board of Director" or "Board" means Board of Directors of the Company.
- **d.** "Claimant" means and includes the Investor, legal heirs, successor or permitted assigns of the Investor and such other person as may be permitted under the Applicable Laws.
- **e. "Due Date"** means the date from which interest, dividend, or redemption amount is payable on the NCS.
- **f.** "**Financial Year**" means the accounting year of the Company commencing on April 1st of each calendar year and ending on March 31st of the following calendar year.
- **g.** "Investor Education and Protection Fund or IEPF" means the fund constituted in terms of Section 125 of the Companies Act, 2013.
- h. "Investor" means persons who have invested in any of the Non-Convertible Securities of the Company.
- i. "Nodal Officer" means the Nodal Officer as designated by the Company in terms of SEBI Circular.

- **j.** "Non-Convertible Securities" or "NCS" means debt Securities, non-convertible redeemable preference shares, perpetual non-cumulative preference shares, perpetual debt instruments and any other securities as specified by the Securities and Exchange Board of India as issued by the company and listed on any of the recognized stock exchange.
- **k. "Unclaimed Amount"** means any interest, dividend, redemption amount with respect to any NCS held by the investor which has become due to be paid to the Investor but which has not been paid or claimed within thirty days from the due date.
- I. "SEBI" means the Securities and Exchange Board of India.

All Word and expressions used in this Policy but has not been defined hereunder but defined under the SEBI Act, 1995 or any of the rules or regulations framed thereunder, the Companies Act, 2013 and the rules framed thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modifications or re-enactment thereto as the case may be.

4. APPOINTMENT OF THE NODAL OFFICER

The Company Secretary of the Company is designated as the Nodal Officer for the purpose of this policy and the SEBI Circular.

The Nodal officer shall be responsible for compliance of this Policy and the SEBI circular. The Nodal Officer shall also be responsible for verification of the claims filed by the Claimants and shall act as a point of contact and shall co-ordinate with the Claimants, SEBI, Stock Exchange(s), and Depositories etc.

5. TRANSFER OF UNCLAIMED AMOUNTS TO ESCROW ACCOUNT

The Company shall, as and when required, open and maintain one or more Escrow Account (by whatever name called) with one or more scheduled bank.

The Company shall within Seven days from the expiry of the thirty days from due date of payment, transfer the Unclaimed amounts to an Escrow Account.

6. PROCEDURE FOR FILING OF CLAIMS FOR UNCLAIMED AMOUNT

The following is the process to be followed by a Claimant for filing claim for Unclaimed Amount:

- The Claimants shall submit the application to Company in the format and along with supporting documents as prescribed in **Annexure-A** of this Policy ("the Claim").
- The aforesaid application along with prescribed supporting documents shall be sent /submitted to the Company at its registered office and addressed to the Company Secretary.
- The Company shall verify the Claim taking into account the application along with the supporting documents submitted by the claimant.
- As per Company's policy, upon receiving a claim application, if any additional information is required or identify any defects or incompleteness in the application or documents, we will notify the investor through email or written communication. The investor will be instructed to address the information or rectify the issues within thirty days from the communication date.
- The claimant shall then rectify the defects in the claim, submit complete claim and /or furnish the required information, document and / or clarification within a period of thirty days or such extended period as may be agreed by the Nodal Officer from the date of receipt of communication from the Company.

- In case the Claimant fails to furnish the rectified Claim or the information, document or clarification within the aforesaid period of thirty days or such extended period as may be agreed by the Nodal Officer then the claim shall be rejected by the Company.
- Rejection of Claim by the Company would not debar the claimant to file fresh Claim with the Company. The Claimant may file a fresh Claim in the same manner as prescribed in this policy.
- The Company shall within 30 days of receipt of the Claim from the Claimant or complete information as called upon from the Claimant remit the payment to the claimant as per the mode of payment prescribed under the SEBI Circular or any other guidelines issued by the SEBI from time to time.
- The aforementioned procedure in respect of the investor / Claimant, shall apply, mutatis
 mutandis, to the legal heir / successor / nominee of the investor subject to legal heir /
 successor / nominee satisfying the provisions specified under the SEBI (LODR) Regulations,
 2015 and circulars issued thereunder, for the transmission of non-convertible securities and /
 or the corresponding Claim thereon, as applicable.

7. INTEREST IN CASE OF DEFAULT

In case of any default is made in transferring the amount to escrow account as required above, the Company shall be required to pay interest on the amount that has not been transferred 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 12% per annum. The said interest amount shall accrue to the investors in proportion to the amount remaining unclaimed.

8. CONTACT DETAILS FOR RAISING QUERIES / CONCERNS

The investor / Claimant may raise queries or concerns with respect to the Unclaimed Amount and / or Claim filed by them with the Company at the below mentioned address:

Nodal Officer: Mr. Sharad Pathak, Company Secretary and Chief Compliance Officer

Email id: sharad.pathak@aavas.in
Contact Number: + 91 141 465923

9. 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 SEBI.

10. 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.

Date of Approval by the Board: April 25, 2024

Date of Review/Amendment by the Board: April 24, 2025

Version: 1.0

Annexure A

(To be furnished by the Claimant for claiming the unclaimed interest/dividend/redemption amount)

I. <u>Details of the investor and / or Claimant:</u>

- (a) Name of the investor:
- (b) Name of the Claimant, if different from investor:
- (c) PAN of investor:
- (d) PAN of Claimant, if different from investor:
- (e) Address of investor:
- (f) Address of Claimant, if different from investor:
- (g) Relation of the Claimant with the investor:
- (h) Contact No. of the Claimant:
- (i) E-mail address of the Claimant:
- (j) Bank account details where the refund is to be made(Bank account number, Name of Bank, IFSC code , Branch address):

II. Details of amount Claimed for refund:

ISIN of NCS	DP ID and Client ID of the investor	Amount of Claim (in INR)	Category of Claim (interest/Dividend/Redemption amount)	Date when amount became due for payment

III. Enclosure:

- 1. Self-certified copy of PAN Card
- 2. Self-certified copy of Aadhaar Card
- 3. Proof of address of investor/legal heir/nominee, as applicable
- 4. Proof of Entitlement or holding of non-convertible securities / demat account statement, of investor, as applicable
- 5. Cancelled cheque for the bank account of the investor where payment is to be made:
- 6. In case the claimant is legal heir or nominee, additionally the Claimant shall submit the below:
- Notarized copy of death certificate:
- No Objection certificate (NOC) from other heir(s), if applicable
- Notarized will or Succession Certificate

IV. <u>Declaration:</u>

I hereby declare that all the information given herein above is true, correct and complete including the attachments to this application form and nothing material has been suppressed.