VERITAS FINANCE LIMITED

POLICY FOR PROCESSING UNCLAIMED AMOUNTS

Summary of Policy

Policy Name	Policy for Processing Unclaimed Amounts
Date of approval	April 25, 2024
Periodicity of review	Annual
Owner / Contact	Secretarial & Compliance
Approver	Board of Directors

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REVISION HISTORY

S. No.	Date of approval/revision	Particulars
1	April 25, 2024	Policy approved by Board of Directors.
2	October 29,2026	The Policy has been amended to align with Regulation 61A and the extant provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

1 BACKGROUND

Regulation 61A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('LODR Regulations'), 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 of the Company'.

In this regard, the Securities Exchange Board of India (SEBI) vide its Circular dated November 8, 2023, has prescribed a procedural framework for dealing with unclaimed amounts lying with entities having listed securities and manner of claiming such amounts by Investors, and detailed the process to be followed by the Company in dealing with unclaimed securities and benefits accrued thereon and the process to be followed by Investors in claiming such amounts.

Pursuant to the aforesaid circular, the Company is required to formulate a policy specifying the process to be followed by Investors for claiming the unclaimed amounts.

Accordingly, the Board of Directors of Veritas Finance Limited ('the Company') have framed and approved a policy for dealing with unclaimed amounts lying with the Company and the manner of claiming such amounts by investors.

2 DEFINITIONS

"**BENPOS"** shall mean the Investor list shared by the Depositories which includes name of holder of securities, PAN, no. of securities held, email id, contact details, bank account details, as on Record Date defined for payment.

"Company" shall mean Veritas Finance Limited.

"**Investor(s)"** shall mean holder of listed securities of the Company.

"**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.

"Depositories" shall mean National Securities Depositories Limited and Central Depository Services (India) Limited

"**ISIN"** shall mean International Securities Identification Number allocated by the Depositories for the allotment of Securities.

"Record Date" shall mean the date for determining the holders of securities for payment.

"RTA" shall mean Registrar & share transfer agent appointed by the Company.

"**SEBI**" stands for Securities and Exchange Board of India

"Stock Exchange" shall mean the stock exchange designated by the Company for the securities.

"Unclaimed Amount": Any interest, dividend or redemption amount in respect of listed non-convertible securities which has become due for payment and has not been claimed within thirty days from the due date of such payment, in terms of Regulation 61A.

Words denoting the singular shall include the plural and vice versa. Words denoting any gender include all genders. The terms not defined hereunder shall have the same meaning as assigned to it under SEBI (Listing Obligations & Disclosure Requirements), Regulations, 2015 and Regulations, Circulars, Notifications as issued by SEBI from time to time.

3 OBLIGATIONS OF THE COMPANY

The Company shall not forfeit unclaimed interest/dividend/redemption amount.

The Company shall make payment to the Investor who holds the securities of the Company, as on Record Date disclosed by the Company with Stock Exchange and Depositories, on the due date of payment as per the terms of the Disclosure Document, as the case may be. The payment shall be based on BENPOS provided by RTA, received through the Depositories.

The interest / dividend / redemption monies that have remained unclaimed for more than thirty (30) days from the due date of payment shall be dealt with by the Company in the manner prescribed herein. The Company shall have following obligations in dealing with unclaimed amount and benefits accrued thereon:

A. The Company shall, within seven days from the date of expiry of the thirty days from the due date of interest/ dividend/ redemption payment, transfer the unclaimed amounts (*if any*) to an escrow account to be opened by it in any scheduled bank.

B. In case a default is made in transferring the amount or part thereof to the Escrow Account Company 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 (12%) per annum. The said interest amount shall accrue to the Investors in proportion to the amount remaining unclaimed.

The Company shall publish a list containing the names of the Investor(s) and their respective amount(s) lying unclaimed on its website within a period of 30 (thirty) days from the date of transfer in the format specified at **Annexure I**. Such a 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.

The Investor may verify any unclaimed amount due to them and lying in the Escrow account of the Company on the website of the Company. The following information will be available:

i. Amount due to the investor on the date of payment;
ii. Category – interest / dividend / redemption amount;
iii. Date when amount became due (DDMMYYYY);
iv. Amount transferred to Escrow account;
v. Date when unclaimed amount was transferred to Escrow account.

Any change in the information uploaded on the website shall be updated by the listed entity by the seventh day of the succeeding month.

4 PROCESS FOR MAKING CLAIM BY INVESTORS

A. An Investor/ their legal heir/Nominee may make an application to the Company directly or through an intermediary (trustee, RTA, brokers, etc.) for claiming of the unclaimed interest / dividend / redemption amount. The format to submit the claim is appended as **Annexure II.**

B. The Investor (in case of institutional investor) shall, along with the application in para-A above shall submit the following self-certified documents for verifying their claim:

a. Certificate of incorporation/ Certificate of registration
b. Memorandum of Association
c. Articles of Association
d. Self-attested copy of PAN
e. Master data downloaded from Ministry of Corporate Affairs
f. List of Authorized Signatories
g. Proof of holding (Demat account statement)
h. Client Master Copy (CML)
i. Bank account details (Cancelled Cheque) in which the investor is willing to get the unclaimed amounts credited.
j. Any other document(s), as may be required depending upon the facts of the case.

C. The Investor (in case of individual investors or HNIs) shall, along with the application in para-A above shall submit the following self-certified documents for verifying their claim:

a. Proof of identity (PAN, Passport etc.)
b. Proof of address (Aadhaar, passport etc.)
c. Proof of holding (e.g. Demat account statement)
d. Client Master Copy (CML)
e. Bank account details (Cancelled Cheque etc.) in which the investor is willing to get the unclaimed amounts credited.
f. Any other document(s), as may be required depending upon the facts of the case.

D. **In case of claim by legal heir/nominee**:

The aforesaid requirements in respect of the Investor, shall apply, mutatis mutandis, to the legal heir/ successor/ nominee of the investor. The legal heir/ successor/ nominee shall satisfy the provisions specified under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and circulars issued thereunder, for the transmission of securities and/or the corresponding claim thereon, as applicable.

Save as provided in respective regulations regarding transmission of securities and/or the corresponding claim thereon, the claimant shall submit following:

- Self- attested Client master copy (with nominee details) *
- Death certificate from Municipal authority
- Self-attested PAN copy of Claimant
- Self-attested address proof (Aadhaar, passport etc.)
- Death Certificate of the Investor (to be certified by the nominee / legal heir)
- Probate of will of the Investor / Succession certificate (in case of legal heir)
- Proof of holding (e.g. Demat account statement)
- Cancelled cheque leaf of the bank account in which the investor is willing get the unclaimed amounts credited.
- Legal heir certificate attested by Notary Public
- Notarized No-objection certificate executed by non-claiming legal heir.
- Indemnity Bond executed in non-judicial stamp paper.

** Claimant shall submit separate CML (with nomination details) for holdings under each ISIN*

E. The application along with the requisite documents shall be submitted to the Company through registered post/courier at the registered office of the Company at Veritas Finance Private Limited SKCL Central Square 1, South and North Wing, 7th Floor, Unit # C28 - C35, CIPET Road, Thiru Vi Ka Industrial Estate, Guindy, Chennai – 600032, Tamil Nadu or through email at the following email address: secretarial@veritasfin.in / treasury@veritasfin.in.

F. The Company shall, within a period of ten (10) working days from the date of receipt of the claim verify the authenticity & communicate through email or other written communication, the status of claim to the Investor/legal heir/nominee. If the claim is rejected, the Company shall be required to state the reasons for rejection & call for further information/documents causing the reason for rejection.

G. The Company may also call upon the Investor/legal heir/nominee to provide any clarifications including additional information, documentation with regard to the claim filed by the Investor/legal heir/nominee. The Investor/legal heir/nominee shall be liable to provide clarification, information, or documentation sought within a period of thirty (30) days from the

date of receipt of communication by the investor. If the Investor/legal heir/nominee does not provide the required information/documentation within thirty (30) days from the date of receipt of such communication, the claim may be rejected. However, the rejection of claim does not debar an Investor/legal heir/nominee from making fresh claim.

H. Any claim filed by the Investor/legal heir/nominee, shall be processed by the Company within a period of thirty (30) days from the date of application or from the date of additional clarifications, information or documentation whichever is later using electronic modes of fund transfer.

I. Any amount transferred to escrow account of the Company in pursuance of Regulation 61A(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, which remains unpaid or unclaimed shall be transferred, to Investor Education and Protection Fund (**IEPF**) in accordance with Section 125 of the Companies Act 2013and rules made thereunder.

The Investors/legal heir/nominee are required to make the claim application with the Company within aforesaid period of seven years.

5 REJECTION AND OPTION OF RE-FILING OF CLAIMS

An application for claim of unclaimed interest / dividend / redemption amount shall be liable to be rejected by the Company in the following circumstances:

1) Application not supported by prescribed documents.
2) Discrepancy in the application, or the documents submitted
3) False claims/application
4) Duplicate claim
5) Documents submitted have not been certified by proper authority / signatory (in case of the institutional investor)
6) Where the Investor / nominee / legal heir fails to submit any additional information or documents sought by the Company within the specified timelines
7) Claims beyond the period of seven years from the due date of such transfer to escrow account of the Company
8) Unclaimed amounts/interest or principal have been remitted to the Investor / nominee / legal heir previously

The Investors/legal heir/nominee have an option to refile the claim application with the Company within a period of seven (7) years from the date of amount being due.

6 PROCESSING OF CLAIM BY THE COMPANY

A. The Company shall within thirty days of receipt of a claim application from an investor or complete information as called upon from the investor, remit the payment to the investor using electronic modes of funds transfer.

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

C. Investors may seek assistance from Nodal Officer for any queries/clarification relating to their claim.

7 NODAL OFFICER

The Company Secretary and Compliance Officer shall act as the nodal officer who shall be the point of contact for Investors entitled to claim their unclaimed amounts. The details of Nodal Officer are as under:

Ms. V. Aruna
Company Secretary and Compliance Officer
Veritas Finance Private Limited
SKCL Central Square 1, South and North Wing, 7th Floor, Unit # C28 - C35,
CIPET Road, Thiru Vi Ka Industrial Estate, Guindy, Chennai – 600032, Tamil Nadu.
Ph: 044 46150029
E-mail: secretarial@veritasfin.in / treasury@veritasfin.in

The Name, designation and contact details of Nodal officer are also made available on the Company's website https://www.veritasfin.in/.

8 REVIEW

This policy shall be reviewed periodically / annually and may be amended / revised based on decisions taken by the Board or its Committees.

Annexure I

Display on information of unclaimed amounts on the website

S. No.	Amount lying unclaimed in Escrow Account as at end of seven years (in INR)	Category (Interest/ Dividend/ Redemption amount)	No. of investors	Date when amount became due (dd/mm/yyyy)	Date when unclaimed amount was transferred to Escrow Account (dd/mm/yyyy)	Date when amount is to be transferred to IEPF (dd/mm/yyyy
	Total					

Name and designation of the Nodal Officer:

Email ID and phone no.:

Annexure II

Format for Investor / nominee/ legal heir making an application for claiming unclaimed interest / dividend / redemption amount lying unpaid in the escrow account of the Company

Details of the Investor/ nominee / legal heir:

Name of Investor:	
Category: (Self/legal heir/ nominee)	
Status (Corporate/entity/Individual)	
PAN/Passport No.	
CIN / Registration number (other than individual)	
Address:	
Contact number:	
E-mail Address:	
Bank Account details (Bank account number, Name of the Bank, Type of account, IFSC Code, Branch address) in which payment is to be made.	

S. No.	*ISIN*	*Number of securities held*	*DP ID & Client ID*	*Unclaimed amount (Rs)*	*Category of payment (Interest/Principal /Dividend)*	*Due date of payment*

Encl: as above
(*For details on mandatory enclosures, please refer Para 4 of Policy for processing unclaimed amounts)*

Name:
Signature:

Date:
Place:

Annexure III

(To be furnished by the listed entity along with transfer of unclaimed amount to IEPF*)*

I. Details of the listed entity:

a. Name –
b. PAN –
c. Registered office address –
d. Correspondence office address -
e. Phone number –
f. Email ID –

II. Details of Nodal Officer of listed entity:

a. Name –
b. Designation –
c. Registered office address –
d. Phone number –
e. Email ID -

III. Details of unclaimed amounts:

S. No.	Name of the Investor	Last known address, contact details (email ID and phone no.) of investor	PAN of the Investor	DPID/ Client ID of the Investor (if applicable)	ISIN	Amount transferred from Escrow Account to IEPF (in INR)	Category of Amount (interest/ dividend/ redemption amount)	Date of Payment to IEPF	UTR No.

Signature:

Name:

Designation of Officer (with stamp):

Place: