



TRUCAP FINANCE LIMITED

**POLICY FOR CLAIMING AND VERIFICATION OF UNCLAIMED AMOUNTS WITH RESPECT TO NON-
CONVERTIBLE DEBENTURES**



VERSION CONTROL

Sr. No.	Details of Changes	Date of Creation / Change	Department	Version No.	Approved By
1.	Original Document	May 28, 2024	Corporate Secretarial & Compliance Team	1.0	Board of Directors



1) BACKGROUND

The provisions of Securities and Exchange Board of India (“SEBI”) (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, states that where the interest/ dividend/ redemption amount has not been claimed within thirty days from the due date of interest/ dividend/ redemption payment by an investor, 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.

Further, with a view to streamline the process and procedures for investors holding non-convertible debentures of listed entities who has unclaimed amounts (whether in the form of interest or principal), Securities and Exchange Board of India (SEBI) has vide its circular SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 08, 2023 (“Circular”), advised listed entities to have an internal policy and framework in place specifying the process to be followed by investors for claiming their unclaimed amounts and the process to be followed for verification of claims.

TruCap Finance Limited (“Company”) raises funds by way of issuance and allotment of Non-Convertible Debentures (“NCDs”) and accordingly to comply with the aforesaid Circular, the Board has approved the Policy for claiming and verification of unclaimed amounts with respect to Non-Convertible Debentures (“Policy”).

This Policy provides framework for:

- dealing with unclaimed amounts either in the form of interest and/or redemption amounts if any, from the escrow accounts (“unclaimed amounts”) arising out of issue of NCDs;
- process and verification of 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 of NCDs or both which they are entitled to claim as per extant regulations.

2) APPLICABILITY

The Policy shall apply to all the investors who are holding NCDs of the Company, which are listed on any of the stock exchanges and is effective immediately from the date of approval of this Policy.

3) PROCEDURE FOR CLAIMING THE UNCLAIMED AMOUNTS

An investor or its legal heir is advised to first check whether any unclaimed amount is due to be payable to them from the details uploaded by the Company on its website. In case the claim is genuine, the investor shall make an application in the format specified under Annexure A of this



Policy and submit the below documents to the Company and/or the Registrar and Share Transfer Agent of the Company at the address mentioned in clause 4 below:

(a) In the event the claim is being submitted by an Investor:

- Request Letter (Refer Annexure A).
- Self-attested KYC documents.
- For Institutional Investors constitutional documents and scanned copy (PDF/JPG Format) of the relevant board resolution/authority letter, etc by authorized signatory(s) of such investors.
- Certified copy of the updated Client Master List (CML) with revised/correct bank details.
- Cancelled cheque from the same bank account which is getting reflected in the revised CML.
- An indemnity bond (Refer Annexure B) on non-judicial stamp paper of Rs. 100/-.

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

- Request Letter (Refer Annexure A).
- Self-attested KYC documents of the investor and the legal heir.
- Notarized copy of Death Certificate of the deceased holder.
- Certified copy of the updated Client Master List (CML) of the investor with revised/correct bank details.
- Cancelled cheque from the same bank account which is getting reflected in the revised CML.
- An indemnity bond (Refer annexure B) on non-judicial stamp paper of Rs. 100/-.
- Individual Affidavits or no-objection certificate 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 verifying and 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.

4) MANNER OF SUBMISSION OF CLAIM BY THE INVESTOR

The investors/legal heir may submit its application along with the requisite documents for claiming of the unclaimed amounts to either the Company or the Registrar and Share Transfer Agent of the Company or both at the below address:



Particulars	Company	Registrar & Share Transfer Agent
	TruCap Finance Limited	MCS Share Transfer Agent Limited
Addressed to	Deputy Nodal Officer	Mr. Subodh Vichare
Registered Office Address	A-Wing, 3 rd Floor, D. J. House, Old Nagardas Road, Andheri (East), Mumbai-400 069.	3B3, 3 rd Floor, B-Wing, Gundecha Onclave Premises Co-Op. Society Ltd. Kherani Road, Saki Naka, Andheri (E), Mumbai - 400 072.
Email Id	corpsec@trucapfinance.com	subodh.mcssta@gmail.com

5) 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.

6) TIMELINES FOR SUBMISSION OF CLAIM BY THE INVESTOR AND PROCESSING THE CLAIM THEREOF:

- (a) Investors/legal heirs may 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.
- (b) Upon receipt of a claim application, the Company, upon examination, if finds it necessary to call for further information or finds such application or document(s) to be defective or incomplete in any respect, shall intimate the investor/legal heir by e-mail or other written communication, seeking further information or to complete defects or incompleteness.
- (c) The Company shall direct the investor/legal heir 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.
- (d) Rejection of claim does not debar an investor from filing a fresh claim.
- (e) The Company shall within 30 days of receipt of a claim application from an investor or complete information as called upon from the investor, if is able to satisfactorily verify the claims shall remit the payment to the investor/legal heir from its Escrow Account using electronic modes of funds transfer.
- (f) Investors/legal heir will be intimated by the Company upon processing of the payment.
- (g) Mode of communication: Physical letters and/or e-mail based on registered address along with the payment details.



7) TIME FRAME FOR RESPONSE

Upon receipt of the documents in all respects, the claim shall be processed after receipt of all the documents from the investors as per timeline mentioned below:

- a. Normal cases: 20 working days
- b. Transmission cases: 45 working days

In case the Company/RTA needs additional time, the Company/RTA shall inform the investor/legal heir the requirement of additional time with expected timelines for resolution of the issue.

In case the complaint is not resolved within the given time or if the customer is not satisfied with the solution provided by RTA, the customer can approach the Nodal Officer. The name and contact details of the Nodal Officer are as below:

**Nodal Officer (Investor
Education and Protection
Fund-under SEBI Framework)**

Ms. Sonal Sharma

Email :

corpsec@trucapfinance.com

Phone No.: 022 6845 7200

8) REJECTION AND RE-FILING OF CLAIM

The claim filed by the investor/legal heir could be rejected for any of the below reasons:

- The amount is already paid.
- The proof of identity and/or proof of address does not match with the investor's records with the Company.
- The bank details are not matching with the investor's records with the Company.
- The documents required for transmission are not provided by the investor.
- The form is unsigned.

The amount is already transferred to Investor Education and Protection Fund (IEPF).

Further, it is at the discretion of the Company that if any other reasons are found, other than those mentioned above, to call for such other documents or information, which the Company deems fit and to decide judicially on the validity of such claims.

The investor/legal heir can re-file the claim after rectifying the error communicated by the RTA/Company and providing necessary documents as requested.

The Company shall have sole discretion in determining whether any claim is accepted or rejected.



9) TRANSFER TO IEPF

The Company shall open an escrow account with any scheduled commercial bank for the purpose of this Policy.

The Company having unclaimed amounts in the escrow account shall upon completion of 7 years from the date of transfer to escrow account, transfer such unclaimed amounts of the investors to IEPF.

10) DISCLOSURE ON THE WEBSITE

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

11) REVIEW/REVISION/AMENDMENTS

The Stakeholders Relationship Committee of the Board will oversee the implementation of this Any changes which are due to regulatory amendments, the same may be approved by either the Managing Director or the Chief Compliance Officer and Legal Head of the Company.

If at any point a conflict of interpretation / information between the Framework and any regulations, rules, guidelines, notification, clarifications, circulars, master circulars/ directions issued by relevant authorities (“Regulatory Provisions”) arises, then interpretation of the Regulatory Provisions shall prevail.

In case of any amendment(s) and / or clarification(s) to the Regulatory Provisions, the Policy shall stand amended accordingly from the effective date specified as per the Regulatory Provisions.



ANNEXURE A

Date:

To,
TruCap Finance Limited,
3rd Floor, A-Wing, D.J. House,
Old Nagardas Road, Andheri (East),
Mumbai-400 069.

Sub: Application for credit of the unclaimed interest/principal amount

Ref: Non-Convertible Debentures issued by TruCap Finance Limited

I/We, _____,
residing at _____, bearing PAN _____ am/are holding Non-Convertible
Debentures (“NCDs”) issued by TruCap Finance Limited (“Company”), as per below details:

Or

I/We, _____, are the legal heirs of late
_____, bearing PAN _____, who was the holder of the NCDs
issued by TruCap Finance Limited (“Company”), as per below details:

Sr. No.	Details	Particulars
1.	No. of NCDs	
2.	ISIN	
3.	Amount remaining unclaimed	
4.	Date since remaining unclaimed	
5.	Nature of unclaimed amount (Whether interest/principal or both) In case the unclaimed amount is with respect to both interest and principal, please give break-up of both the claim amount separately.	

I/We, request you to credit the unclaimed amount in the below 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:

- 1) Self-attested PAN Card Copy and Aadhar Card.
- 2) Certified copy of the updated Client Master List (CML) with your correct bank details.
- 3) Cancelled Cheque from the same bank account which is getting reflected in the revised CML.
- 4) Indemnity bond on non-judicial stamp paper of Rs. 100/-
- 5) Individual Affidavits or no-objection certificate given each Legal Heir

Request you to process the credit of the unclaimed amount.

Thanking you,
Yours faithfully,

(Name of the Investor/Legal heir)
(Address)
(Contact Details)
(E-mail id)



ANNEXURE B

INDEMNITY BOND

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

To,
TruCap Finance Limited,
3rd Floor, A-Wing, D.J. House,
Old Nagardas Road, Andheri (East),
Mumbai-400 069.

THIS DEED OF INDEMNITY is made at _____ this _____ day of _____ of _____

BY

Mr./Ms. _____
wife/son/daughter Mr./Ms. _____
resident of _____ residing at _____

(which expression shall unless it be repugnant to the meaning or context thereof be deemed to mean and include them and their respective heirs, executors, administrators and legal representatives) of the First Part.

IN FAVOUR OF

TRUCAP FINANCE LIMITED a company registered under the Companies Act, 1956, having its registered office at 3rd Floor, A-Wing, D.J. House, Old Nagardas Road, Andheri (East), Mumbai - 400 069 (hereinafter called as the “Company” which expression shall include unless repugnant to the subject or context be deemed to include their successors, permitted assigns, representatives) on the Other Part.

WHEREAS

- 1) Mr./ Ms. _____ holds _____ (Non-Convertible Securities) in the Company and the interest/ redemption (strike out the options which are not applicable) remains unclaimed with respect to said security.
- 2) That Mr. _____ has passed away on _____.
- 3) That I _____ (hereinafter referred as “Claimant”), being the legal heir of the deceased have approached the Company and requested for release of the unclaimed interest/



redemption amount (hereinafter referred to as “Unclaimed amount”) due to the _____ (name of original investor) lying with the Company.

- 4) That in support of the above said request, I have enclosed the following documents:
- (a) _____.
 - (b) _____.

NOW, THEREFORE, THIS INDEMNITY BOND WITNESSETH as under:

- 1) In consideration of the above having agreed to comply with my request on my executing an indemnity bond in favour of the Company, I, the Claimant, hereunder for myself, my heirs, executors, administrators and assigns do hereby agree to indemnify and keep indemnified the Company, its successors, directors, manager and their heirs, executors and assigns from and against all actions, suits, proceedings, accounts, claims and demands whatsoever for or on account of the said securities or any part thereof or otherwise arising out of release of said unclaimed amount in my favor and from and against all losses, costs, claims, actions, demands, risks, charges, expenses, damages and losses arising in any manner whatsoever.
- 2) I hereby solemnly affirm and certify that the statements contained in above paragraphs are true to the best of my knowledge, information and belief and that nothing material has been concealed from being disclosed and are binding on me.
- 3) I hereby also confirm that all the documents submitted to Company are true and correct.

IN WITNESS WHEREOF, this bond of indemnity is executed by my hand on this _____ day of _____, 20__.

Signature:

Name of the Claimant:



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:

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

Name of the Company	Folio No.	No. of securities held

- b) That the deceased had died intestate on ___ / ___ / ____ and without registering any nominee.

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

Name of the Claimant(s)	Folio No.	No. of securities held

- d) 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:

Name of the Legal	Address and Contact Details	Age	Relationship with the Deceased

- e) 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.

- f) 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. _____.



g) 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) _____