



**FRAMEWORK FOR DEALING WITH UNCLAIMED
AMOUNTS OF NCDS**

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1. Preamble

SEBI vide circular dated November 8, 2023 read with Regulation 61A (2) of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”) issued “Procedural framework for dealing with unclaimed amounts (Interest / Dividend / Redemption) lying with entities having listed non-convertible securities and manner of claiming such amounts by investors. The said Circular requires entities having listed Non-Convertible Securities to formulate a policy specifying the process to be followed with respect to unclaimed afore-mentioned unclaimed amounts. The framework also requires the organisation to develop an internal policy outlining the procedure for verifying claims, including the documents to be considered, the ability for investors to check the status of a claim, and so on.

2. Scope

This framework focuses on standardizing the procedure that Protium Finance Limited (“Protium”) must follow when transferring unclaimed interest/dividend/redemption amounts for Non-Convertible Securities to an Escrow Account, as well as when investors make claims on those funds.

3. Applicability

This policy has been formulated in accordance with procedural framework for dealing with unclaimed amounts lying with entities having listed non-convertible securities and manner of claiming such amounts by investors issued by the SEBI vide circular dated November 8, 2023 read with Regulation 61A (2) of the SEBI Listing Regulations as the Non-Convertible Debentures (“Securities”) of Protium are listed on the BSE Limited (“BSE”).

4. Definitions

Act shall mean the Companies Act, 2013, as amended from time to time and Rules made there under.

Company shall mean Protium Finance Limited

Client ID for a demat account is a unique identification number assigned to an individual or entity by a depository participant

Depository is 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.

Depository Participant is an agent of the depository through which it interfaces with the investor and provides depository services.

Investor Education and Protection Fund or IEPF is a fund established by the Central Government of India.

5. Manner of dealing with unclaimed interest / dividend / redemption amounts lying unclaimed with the Company

- i. The interest / dividend / redemption monies that have remained unclaimed for more than thirty (30) days from the due date of payment must be transferred to an Escrow Account created with a scheduled bank within 7 days after the expiry of the 30-day period.
- ii. Pursuant to regulation 61A (3) of the SEBI Listing Regulations, any amount transferred to the escrow account that remains unclaimed for seven years shall be transferred to the ‘Investor Education and Protection Fund’ constituted in terms of Section on 125 of the Companies Act, 2013.
- iii. (ii) The details of unclaimed interest / dividend / redemption payment with respect to the Securities of the Company shall, within a period of thirty days of transferring the unclaimed amount to the Escrow Account, be displayed on the website of the Company at <https://protium.co.in/> in the format specified at *Annexure A*.
- iv. The investors may verify any unclaimed amount due to them and lying in the Escrow account of the Company from the website of the Company.
- v. The following information will be available:
 - a. Amount due to the investor on the date of payment;
 - b. Category – interest / dividend / redemption amount;
 - c. Date when amount became due (DDMMYYYY);
 - d. Amount transferred to Escrow account;
 - e. Date when unclaimed amount was transferred to Escrow account.

6. Process to be followed by the investor / nominee / legal heirs for claiming their unclaimed interest / dividend / redemption amounts and process followed by the Company for verification of claims.

- i. Any investor / their nominee / legal heir claiming to be entitled to any unclaimed interest / dividend / redemption amount for Securities (“Unclaimed amount”) lying with the Company may make an application to the Company for payment of such amount in the format specified for claiming of unclaimed interest / dividend / redemption amount. The format for making an application is appended as *Annexure B*.
- ii. The investor (in case of institutional investor) shall, along with the application shall submit the following self-certified documents for verifying their claim:
 - a. Memorandum of Association
 - b. Articles of Association
 - c. PAN

- d. Master data downloaded from Ministry of Corporate Affairs
 - e. List of Authorized Signatories
 - f. Proof of holding (e.g. Demat account statement)
 - g. Bank account details (Cancelled Cheque etc.)
 - h. Any other document(s), as may be required depending upon the facts of the case.
- iii. The investor (in case of individual investors or HNIs) shall, along with the application 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. Bank account details (Cancelled Cheque etc.)
 - e. Any other document(s), as may be required.
- iv. A Nominee / Legal Heir shall, along with the application 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. Death Certificate of the Investor (to be certified by the nominee / legal heir)
 - d. Probate of will of the Investor / Succession certificate (in case of legal heir)
 - e. Client master / Demat account statement (for confirmation of Nomination)
 - f. Proof of holding (e.g. Demat account statement)
 - g. Bank account details (Cancelled cheque etc.)
 - h. Any other document(s), if required.
- v. The Claim form along with the requisite documents shall be submitted to the Company through registered post at the corporate office of the Company at 7th Floor, Block B2, Phase I Nirlon Knowledge Park, Pahadi Village, Off. Western Express Highway, Cama Industrial Estate, Goregaon East, Mumbai, Goregaon East, Maharashtra, India, 400063 or through email _____ at _____ the _____ following _____ email address amit.gupta@protium.co.in
- vi. The Company may, upon receipt of an application call upon the investor to provide any clarifications including additional information, documentation with regard to the claim filed by the investor. The investor shall be liable to provide clarification, information, or documentation sought within a period of 30 days from the date of receipt of communication by the investor.

- vii. Failure by the investor to provide any clarification, information or documentation sought by the Company within 30 days, shall result in the rejection of claim. However, rejection of a claim shall not debar the investor from filing a fresh claim with the Company.
- viii. Any claim filed by the investor, shall be processed by the Company within a period of 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.
- ix. Investor need to send the letter provided overleaf, duly signed by them, along with self – attested / DP attested copy of client master list with latest/updated bank and address details to our below mentioned address to enable us to issue the payment in lieu of the above interest warrant(s)

Link Intime India Pvt Limited

Unit:- Kamarajar Port Ltd - Bond

C-101, 247 Park, L B S Marg

Vikhroli west

Mumbai – 400 083

Bondholders may contact R TA of the Company by writing to bonds.helpdesk@linkintime.co.in

7. 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:

- i. Where there is any discrepancy in the application, or the documents submitted by the investor /nominee / legal heir.
- ii. Where the investor / nominee / legal heir fails to submit any additional information or documents sought by the Company within the specified timelines.
- iii. Where the documents submitted have not been certified by proper authority / signatory (in case of the institutional investor).
- iv. Where the name as per the application does not match with the Benpos (Beneficiary position) statement issued by the Registrar and Transfer Agent

8. Nodal Officer

The Nodal Officer shall be the point of contact for investors entitled to claim their unclaimed amounts, SEBI, Stock Exchange(s) and Depositories. The details of Nodal Officer are as under:

Mr. Amit Gupta

Chief Financial Officer

7th Floor, Block B2, Phase I Nirlon Knowledge Park,

Pahadi Village, Off. Western Express Highway,

Cama Industrial Estate, Goregaon East, Mumbai – 400063

E-mail: amit.gupta@protium.co.in

The details of Nodal Officer are available on the website of the Company at <https://protium.co.in/investors-relations/>

Unless any other person appointed by the Board of Directors in this regard, the Company Secretary of the Company shall be the Nodal Officer of the Company point of contact for NCS holders entitled to claim their unclaimed amounts, SEBI, Stock Exchange(s) and Depositories. In case there is a change in the Nodal Officer due to any reason, the Company shall designate another person as a Nodal Officer within fifteen days of such change. Further, the contact details of the Nodal Officer or the RTA shall be displaced on the Company's website.

9. Search facility for investor on the website of the Company and maintenance of records

- i. A search facility shall be made available on website of the Company for investors to verify if there is any unclaimed amount due to them and lying in the Escrow Account of the Company. The search criterion will be based on combinations, such as:
 - a. PAN and Date of birth; or
 - b. Name and Depository Participant Identification (DP ID)/ Client Identification (Client ID).
- ii. Upon such search, the following information shall be visible to the investor:
 - a. Amount due to the investor on the date of payment (in INR);
 - b. Category -interest/ dividend/ redemption amount;
 - c. Date when amount became due (dd/mm/yyyy);
 - d. Amount (in INR) transferred to Escrow Account (including penal interest, if any, for delay in transfer by the listed entity);
 - e. Date when unclaimed amount was transferred to Escrow Account (dd/mm/yyyy)
- iii. The Company shall display the cumulative details of the number of claims received, processed, pending, etc. on its website
- iv. The Company shall preserve information pertaining to the unclaimed amounts of investors including relevant documentation. The listed entity shall furnish necessary information, as and when called for by the SEBI.
- v. Any change in the information uploaded on the website shall be updated by the listed entity by the seventh day of the succeeding month.

10. Review

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

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.:

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.

1. Details of the Investor:

- a. Name
- b. PAN/Passport No
- c. Aadhaar
- d. Corporate Identification Number (CIN)
- e. Registered office address
- f. Correspondence office address
- g. Phone number
- h. Email address
- i. Bank Account details where payment is to be made (Bank Account number, Name of the Bank, IFSC Code, Branch address)

S.No.	Name of the Investor	Address and Contact details of the	PAN of the Investor	DPID/ Client ID of the Investor (if applicable)	ISIN	Amount lying unclaimed in the Escrow Account of the Company	Category of (interest/dividend/redemption amount)	Due date of payment

2. Details of Nominee / Legal Heir:

- a. Name
- b. PAN/ Passport No
- c. Aadhaar
- d. Office address
- e. Correspondence address
- f. Phone number
- g. Email address
- h. Bank Account details where payment is to be made (Bank Account number, Name of the Bank, IFSC Code, Branch address)

3. Enclosures

A. In case of institutional investor:

- a. Memorandum of Association
- b. Articles of Association
- c. PAN
- d. Master data downloaded from Ministry of Corporate Affairs
- e. List of Authorized Signatories
- f. Proof of holding (e.g. Demat account statement)
- g. Bank account details (Cancelled Cheque etc.)
- h. Any other document(s), if required.

B. in case of individual investor:

- a. Proof of identity (PAN, Passport etc.)
- b. Proof of address (Aadhaar, passport etc.)
- c. Proof of holding (e.g. Demat account statement)
- d. Bank account details (Cancelled Cheque etc.)
- e. Any other document(s), if required.

C. in case of a Nominee / Legal Heir:

- a. Proof of identity (PAN, Passport etc.)
- b. Proof of address (Aadhaar, passport etc.)
- c. Death Certificate of the Investor (to be certified by the nominee / legal heir)
- d. Probate of will of the Investor / Succession certified (in case of legal heir)
- e. Client master / Demat account statement (for confirmation of Nomination)
- f. Proof of holding (e.g. Demat account statement)
- g. Bank account details (Cancelled cheque etc.)
- h. Any other document(s), if required.

For (Name of the Company)

Signature and Stamp

Name

Designation

Place

Date

(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 of the Investor (if applicable)	ISIN	Amount transferred from Escrow Account to IEPF (in	Category of Amount (interest/ dividend / redemption amount)	Date of Payment to IEPF	UTR

Signature:

Name:

Designation of Officer (with stamp):

Place: