



**POLICY ON CLAIMING OF UNCLAIMED AMOUNTS
WITH RESPECT TO
NON-CONVERTIBLE SECURITIES (“NCS”)**

(As approved and adopted by the Board of Directors at their meeting held on
12 February 2025)



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DOCUMENT CONTROL

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Name	Designation
Sri S Venkatesh	Company Secretary and Chief Compliance Officer

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1	12 February 2025	Base Document	Policy on claiming of Unclaimed Amounts with respect to Non-Convertible Securities ("NCS") initially adopted by the Board of Directors.



ABBREVIATIONS USED

CML	Client Master List
IEPF	Investor Education and Protection Fund
ML	Middle Layer
NBFC	Non-Banking Finance Company
NCS	Non-Convertible Securities
RBI	Reserve Bank of India
RBI-SBR- Direction	Master Direction - RBI (Non-Banking Financial Company - Scale Based Regulation) Directions 2023
RTA	Registrar and Share Transfer Agent
SEBI	Securities and Exchange Board of India
SFL	Sakthi Finance Limited
WDM	Wholesale Debt Market



1.0 INTRODUCTION

- 1.1 Sakthi Finance Limited (“Our Company or SFL”) is a Deposit Taking Non-Banking Financial Company (“NBFC”) and is registered with the Reserve Bank of India (“RBI”) as an “Investment and Credit Company”.
- 1.2 Further, in terms of Master Direction – RBI (Non-Banking Financial Company – Scale Based Regulation) Directions 2023 (“RBI-SBR-Direction”), our Company is classified under Middle Layer (“ML”).
- 1.3 The Equity Shares and Non-Convertible Debentures (“NCDs”) of our Company are listed on the BSE Limited.
- 1.4 Our Company believes in the conduct of its affairs in a fair and transparent manner by adopting the highest standards of professionalism, transparency, honesty and integrity.
- 1.5 Regulation 61A(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 (“Listing 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 to be opened by the Listed Entity in any Scheduled Bank”*.
- 1.6 In terms of paragraph 8 of Annexure-A to SEBI Circular No. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated 8 November 2023, effective 1 March 2024, on ‘Procedural framework for dealing with unclaimed amounts lying with entities having listed non-convertible securities and manner of claiming such amounts by investors’, SEBI has mandated the listed Companies to formulate a policy specifying the process to be followed by the investors for claiming their unclaimed amounts.
- 1.7 In compliance with the above, our Company has proposed to formulate a Policy on claiming of unclaimed amounts with respect to Non-Convertible Securities (“NCS”) and is being documented.



2.0 SCOPE AND APPLICABILITY

- 2.1 For the purpose of funding its growth / business requirements, our Company raises funds by issue of NCDs / RCPS from time to time, through Public Issue / Private Placement of securities. Our Company makes payment of interest / dividend / redemption amount(s) accrued on NCDs / RCPS issued by it, on the due date of such payment.
- 2.2 These NCDs are listed on the Wholesale Debt Market (“WDM”) segment on BSE Limited.
- 2.3 This policy provides a framework for:
- 2.3.1 dealing with unclaimed interest and redemption amounts, if any, arising out of issue of NCDs/ RCPS;
 - 2.3.2 ensuring all claims in relation to unclaimed amounts raised by the Investors are resolved in time; and
 - 2.3.3 ease of access to information and documents required to claim the unpaid / unclaimed amount of interest or / and redemption amount on maturity of NCDs / RCPS or both which they are entitled to claim as per extant regulations.

3.0 DEFINITIONS

- 3.1 “Applicable laws” shall mean to include Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, (including any amendments or re-enactments thereof), Rules/guidelines/ notifications/circulars issued by SEBI and any other regulation, rules, acts, guidelines as may be applicable;
- 3.2 “Board” or “Board of Directors” shall mean Board of Directors of our Company, as constituted from time to time;
- 3.3 “Company” shall mean Sakthi Finance Limited;
- 3.4 “IEPF” shall refer to ‘Investor Education and Protection Fund’ constituted in terms of Section 125 of the Companies Act 2013;



3.5 "Investor" shall mean holder of Non-Convertible Securities;

3.6 "NCS" shall mean Non-Convertible Securities, which includes Non-Convertible Debentures ("NCDs") and Redeemable Cumulative Preference Shares ("RCPS");

3.7 "Unclaimed amount(s)" shall mean amounts due to NCS holders, i.e. interest, dividend and redemption amounts which have not been claimed by such holders;

3.8 "RTA" shall refer to the Registrar and Transfer Agent(s) of our Company;

3.9 "SEBI" shall mean Securities and Exchange Board of India;

All other definitions, not defined herein, shall apply as per applicable laws.

4.0 PROCESS TO BE FOLLOWED BY INVESTORS FOR CLAIMING THEIR UNCLAIMED AMOUNTS

4.1 If interest / dividend / redemption amount(s) have not been claimed by the NCS holder within thirty days from the due date of interest / dividend / redemption payment, our Company shall, within seven days from the date of expiry of the said period of thirty days, transfer the unclaimed amounts to an Escrow Account to be opened by it in any Scheduled Bank.

4.2 Upon, transfer of such amount(s) to the Escrow Account, the NCS holder can follow the process given below to claim the unclaimed interest / dividend / redemption amount(s) due to him:

4.3 The format in which claim has to be submitted by the investor

4.3.1 The Investor is required to submit a request addressed to our Company / RTA along with the necessary supporting documents. The request should preferably be in the enclosed format in Annexure - A.



4.4 The procedure and documentation (including supporting) for making claim, depending on whether the claim is being submitted by the investor – self or by the legal heir/ nominee/ etc. of the investor.

4.4.1 Investor is required to submit the below mentioned documents in case of a self-claim

4.4.1.1 Documents required in case of Physical Holding* – Self-attested Identity Proof, Address Proof and Cancelled Cheque, if KYC is updated.

4.4.1.2 Documents required in case of Demat Holding – Self-attested Updated Client Master List (“CML”). CML can be obtained from investor’s Depository Participant.

* Additional documents (to be submitted only by way of Post/Courier) in case of Physical Holding if the following details are not updated.

Particulars	Click on the link below to access the Form
PAN, Contact details (postal address, Mobile number and E-mail), Bank details	ISR-1 – Investor Service Request for registering details
Nominee details	SH-13 – Nomination Form SH-14 – Cancellation or variation of Nomination ISR-3 – Opting out of nomination (As applicable)
Signature	ISR-1 – Investor Service Request for registering signature ISR-2 – Confirmation of Signature (As applicable)



4.4.2 Documents required in case of claims made by legal heir / nominee(s)

4.4.2.1 In case of claim made by legal heir(s) / nominee(s), they are required to complete the transmission / nomination by submitting the requisite documents in line with 'Chapter V - 20' and 'Annexure 14' of SEBI Master Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/37 dated 7 May 2024 which can be accessed at the link https://www.sebi.gov.in/legal/mastercirculars/may-2024/master-circular-for-registrars-to-an-issue-and-share-transfer-agents_83226.html

4.4.2.2 In case of physical holding, legal heir(s) / nominee(s) are required to submit the documents for registration of transmission/nomination to the RTA/Company and in case of demat (electronic) holding, they are required to submit the documents with their Depository Participant.

4.4.2.3 In case of demat holding, on completion of the transmission/nomination, the legal heir(s) / nominee(s) are required to submit the documents as specified in point no 4.4.1 above along with the following additional documents to the Company/RTA:

- a. Proof of completion of transmission/nomination;
- b. Death Certificate of the deceased investor;
- c. Updated Client Master List ("CML") of the legal heir(s) / nominee(s)

4.4.3 Manner of submission of claim by the investor(s)

4.4.3.1 Investor(s) is / are required to send the documents mentioned above in the following manner:



Through Post / Courier	Hard copies of self-attested documents
Through e-mail	Scanned copies of self-attested documents from your registered e-mail ID

4.4.3.2 Investor(s) is / are required to submit the documents to following address:

Registrar and Share Transfer Agent ("RTA")

MUFG Intime India Private Limited (formerly known as
Link Intime India Private Limited)

Attn: Ms. Shanti Gopalkrishnan
(Unit: Sakthi Finance Limited)

Branch Office at:

"Surya"

35, Mayflower Avenue

Behind Senthil Nagar

Sowripalayam Road

Coimbatore - 641028

Tel : +91 (0422) 2314792 / 4958995/ 2539835/36

E-mail : coimbatore@linkintime.co.in

Website : <https://linkintime.co.in>

or

Company

Sakthi Finance Limited -

Attn: Sri S Venkatesh, Company Secretary and
Chief Compliance Officer

Registered Office: 62, Dr. Nanjappa Road

Coimbatore - 641 018

Tel No : +91 (0422) 2231471-474/4236200

E-mail : investors@sakthifinance.com

Website : <https://www.sakthifinance.com/investor-information>



4.4.4 Timeline within which the investor can submit documents, provide clarifications, etc

4.4.4.1 Our Company after verifying the documents may ask the investor for certain additional documents / clarification as a proof towards claim, for which the investor should respond within thirty days from the date of receipt of such communication, failing which the claim may be rejected.

4.4.5 Conditions for rejection of claim and option of re-filing of a claim by the investor

4.4.5.1 Our Company will verify the documents received from the investor and may reject the claim if the documents received are not in order / partial documents received from the investor, signature mismatch etc. within 30 days of receipt. However, rejection of claim does not debar an investor from filing a fresh claim.

4.4.6 Timeline within which the claim shall be processed by the listed entity

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

4.4.7 Contact details (e-mail ID and phone number) wherein investors can raise their queries or grievances, if any, relating to their claim

Name	Sri S Venkatesh
Designation	Company Secretary and Nodal Officer
E-mail ID	investors@sakthifinance.com
Contact Number	98949 47790



5.0 ACCESS TO DETAILS OF UNCLAIMED AMOUNTS ON COMPANY'S WEBSITE

5.1 Our Company will, on its website at the link: <https://www.sakthifinance.com/investor-information/>, upload details of unclaimed amount(s) for investors to verify if there is any unclaimed amount due to them and lying in an Escrow Account of the Company.

6.0 TRANSFER OF UNCLAIMED AMOUNT TO INVESTOR EDUCATION AND PROTECTION FUND ("IEPF")

6.1 As per Regulation 61A(3) of the Listing Regulations, any amount transferred to the Escrow Account in terms of Regulation 61A(2) of the Listing Regulations, remaining unclaimed for a period of seven years will be transferred to the Investor Education and Protection Fund ("IEPF") constituted in terms of Section 125 of the Companies Act 2013.

6.2 Even after transfer of unclaimed amount(s) to IEPF, Investor would be able to claim such amount(s) from IEPF.

7.0 MAINTENANCE OF RECORDS

7.1 Our Company / RTA shall preserve all information pertaining to the unclaimed amounts of investors including relevant documentation required as per applicable law.

7.2 In case of receipt of request from the investor for transfer of investor's account, the consent or objection of our company, if any, will be conveyed within 21 days from the date of receipt of request for transfer to both transferor and transferee. Such transfer shall be as per transparent contractual terms in conformity with law.

8.0 DISCLOSURES

8.1 Our Company shall make appropriate disclosures in compliance with the provisions of the Listing Regulations, in particular the disclosures required to be made on the website of the Company.



9.0 DISSEMINATION OF THIS POLICY ON COMPANY'S WEBSITE

9.1 This policy will be made available on our Company's website.

10.0 LIMITATION

- 10.1 Statutory / regulatory provisions and any amendments thereon, made from time to time, as applicable to our Company shall be binding on our Company and will be complied with even if they are not specifically incorporated in this Policy.
- 10.2 In case of any conflict between the provisions of this Policy and statutory / regulatory provisions or amendments thereof from time to time, the stricter provisions, in compliance with the law, shall prevail.

11.0 COMPLAINTS, FEEDBACK AND SUGGESTION

- 11.1 The borrower may report his/her complaint/ grievance in writing to the Company / Branch concerned from where he / she made the investment in NCDs / RCPS. On receipt of such complaint / grievance, the Branch Manager of the Company shall immediately take up the matter for redressal.
- 11.2 The investors are requested to give their feedback and suggestions on the services of the Company to the Nodal Officer.

12.0 REVIEW AND AMENDMENT

- 12.1 This Policy shall be reviewed / amended in line with statutory / regulatory requirements.

13.0 REFERENCES

- 13.1 SEBI Circular No. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated 8 November 2023.



13.2 SEBI Master Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/37
dated 7 May 2024 .

Date: 12 February 2025

Place: Coimbatore

(As approved and adopted by the Board of Directors at their meeting held on
12 February 2025)



Annexure ARequest Letter for claiming unclaimed amounts by NCS holders

To

Nodal Officer
Sakthi Finance Limited
Registered Office: 62, Dr. Nanjappa Road
Coimbatore - 641 018

Dear Sir,

FOLIO/DPID/CLIENT ID: _____

I / We request the Company to credit/ transfer all the unclaimed amount(s) of prior period(s) in respect of NCS held by me, pertaining to the captioned Folio and lying with the Company, electronically to my bank account as per details submitted/ available with you or received by you from my depository participant.

I / We hereby confirm that I / We have not encashed, negotiated or otherwise dealt in any unclaimed amounts paid by the Company so as to create any adverse claim upon such amounts.

In consideration of you crediting the unclaimed amounts electronically to my bank account in lieu of the demand draft(s) lying unclaimed/ unpaid in my/ our name(s) and which are irretrievable/ lost or misplaced, I / We hereby agree and undertake to hold the Company, its Directors and officers harmless and to keep them protected from/against all losses, costs or damages which they may sustain or incur by reason of the Company crediting the unclaimed amounts electronically, or by the original demand draft(s) being, at any time, found and presented for payment by any person or persons claiming to be the holder(s) of the demand draft (s) or in any way interested therein.

I / We further agree and undertake to return to you the original demand draft(s), should it be found by me/us or again come into my/our possession at any time hereafter.



	Name	Signature
First Holder:		
Second Holder:		
Third Holder:		
Address of First Holder:		
Witness 1		Witness 2
Name:		Name:
Address:		Address:
Signature:		Signature:

Date:

Note:

1. For this Request Letter to be considered as complete, please ensure the name and address of first holder and joint holders, if applicable, are filled correctly and it is duly signed by all the holders and 2 witnesses.
2. Enclose self- attested Client Master List (if shares are held in Demat form) or Form ISR-1 along with self-attested copy of PAN Card, address proof and cancelled cheque (if NCS are held in physical form).

