MANAPPURAM FINANCE LIMITED (MAFIL)

POLICY FRAMEWORK ON DEALING WITH AND THE MANNER OF CLAIMING UNCLAIMED AMOUNT OF SECURED REDEEMABLE NON-CONVERTIBLE DEBENTURES ("NCDS") BY INVESTORS

Version Control		
Version Number	**Description**	**Date**
Version 1	**New Policy**	**07-02-2024**
Version 2	**Renewal**	**20-03-2025**
Version 3	**Renewal**	**30-03-2026**
Version 4	**Renewal**	**12-11-2026**

Effective Date : 12-11-2026

Next Review Date : 12-11-2027

Policy Owner : Secretarial department

Prepared By : Secretarial department

Recommended by : Stakeholders Relationship and Securities Transfer Committee

Approved by : Board of Directors

1. PREAMBLE

The Board of Directors ("**The Board**") of Manappuram Finance Limited ("**the Company**") has adopted the following policy in line with the SEBI Circular SEBI/HO/DDHS/DDHSRAC-1/P/CIR/2023/176 dated November 08, 2023. The said Circular mandates the entities to formulate a policy specifying the process to be followed by investors for claiming their unclaimed amounts and a process to be followed for verification of claims.

2. DEFINITIONS

i. **NCD** means listed Non-Convertible Debentures issued by the Company.

ii. **Unclaimed Amount** includes unclaimed / unpaid maturity amount and/or interest.

iii. **Escrow Account** means that Escrow Account opened by the Company with any scheduled bank.

iv. **RTA** means Registrar and Transfer Agents.

v. **IEPF** means Investor Education and Protection Fund.

3. OBLIGATIONS OF THE ENTITY

POLICY AND PROCESS FOR TRANSFER TO ESCROW ACCOUNT AND IEPF ACCOUNT

1) Where the interest/redemption amount has not been claimed within thirty days from the due date of interest/redemption payment, then within seven days from the date of expiry of the said period, the amount will be transferred to an Escrow Account opened by the Company in any scheduled bank.

2) The amount transferred to the escrow account that remains unclaimed and unpaid shall be transferred to the 'Investor Education and Protection Fund' in accordance with section 125 of the Companies Act, 2013 and rules made thereunder

a) Transfer of unclaimed amounts to Escrow Account: In terms of Regulation 61A (2) of the SEBI LODR Regulations, the 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 opened by it in any scheduled bank.

b) Interest in case of default: In case a default is made in transferring the amount referred in paragraph 'a' above or part thereof to the Escrow Account of the Company, it 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 per annum. The said interest amount shall accrue to the investors in proportion to the amount remaining unclaimed.

4. PROCESS FOR CLAIMING UNCLAIMED AMOUNT

Amount lying in the escrow account.

Where the interest/dividend/ redemption amount has not been claimed within thirty days from the due date of interest/dividend/redemption payment, the Company will transfer the amount to an Escrow Account opened with any scheduled bank.

However, the investor can claim back the amount from the Escrow Account by following the procedures below:

- In case if debentures were held in physical form, the investors shall produce the below mentioned documents in order to process their request for revalidation through electronic mode:

  1. Duly signed request letter. (Annexure I)

  2. Original cancelled cheque leaf for all the registered security holders. Original cancelled cheque leaf bearing the name of first holder OR latest copy of the bank passbook/statement with details of bank name, branch, account number and IFSC duly attested by the bank. Alternatively, Bank details as per CML enclosed will be updated in the folio.

  3. Self-attested copy of PAN Card of the first security holder (front & back).

  In case the signature has changed over the period of time, the investors shall send the ISR- 2 form and the original cancelled cheque leaf along with above mentioned documents.

- In case if debentures were held in Demat form, the current bank details should have to be updated with the depository participant and then the updated client master list should be forwarded along with duly signed request letter.

The relevant Forms ISR-1, ISR-2, ISR-3, SH-13, SH-14 are available on the RTA's website https://web.in.mpms.mufg.com/KYC-downloads.html

The above documents need to be lodged with the Registrar & Transfer Agents at the below mentioned address:

MUFG Intime India Private Limited
Unit:- Manappuram Finance Ltd - Bond
C-101, Embassy 247, L.B.S. Marg
Vikhroli (West)
Mumbai – 400 083

If debentures were held in Demat form of deceased investors, the legal heir/nominee shall comply with the transmission procedure with the depositary participant and shall submit the following additional documents to process the interest/redemption payment in the name of the legal heir or nominee.

1. Request letter duly signed by registered nominee / legal heir.
2. Updated Client Master List (CML copy) of registered nominee / legal heir .
3. Client Master List (CML copy) of deceased holder .
4. Holding cum transaction of the above mentioned demat account.

5. Notarized death certificate of deceased holder- Self-attested copy of Verifiable Death Certificate of the deceased holder/if copy of Death Certificate is not Verifiable claimant needs to submit the original or notarised copy of Death Certificate of the deceased holder.

For transmission procedure for debentures held in physical form.

Hard copy of request letter duly signed by the applicant/legal heir along with a copy of death certificate of deceased share holder and self-attested proof of identification and proof of address of the applicant/ legal heir. Upon receipt of the request letter/documents, necessary procedure will be provided to you.

From the day following the day the interest or redemption amount was sent to the Escrow Account until the day before the money will be transferred to the IEPF, investors may assert their right to receive their money back from the Escrow Account.

Claim Processing:

Upon receipt of a claim application, if the Company, upon examination, finds it necessary to call for further information or finds such application or document(s) to be defective or incomplete in any respect, it shall intimate the investor, of such need for information or defects or incompleteness, by e-mail or other written communication. The Company shall direct the investor to furnish such information or to rectify such defects or incompleteness or to re-submit such application or document(s) within thirty days from the date of receipt of such communication, failing which the claim may be rejected.

A claim is liable to be rejected if the details furnished in the application for claim does not match with the details received as per the Beneficiary Position received by the Company from the Depositories (i.e. National Securities Depository Limited / Central Depository Services (India) Limited).

However, rejection of claim does not debar an investor from filing a fresh claim.
Processing of claims received within a period of seven years of being unpaid/unclaimed

The Company shall within thirty days of receipt of a valid claim application and requisite documents from an investor as called upon from the investor, remit the payment to the investor using electronic modes of funds transfer. In case of any queries/ grievances the investor can contact the Nodal Officer whose details are specified as follows:

Company Secretary & Compliance Officer
Email : cs@manappuram.com, cosecretary@manappuram.com

Phone – +91 487 3050413 / 417

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

Processing of claims received after transfer of Unclaimed Amount to Investor Education and Protection Fund ("IEPF") set up by the Government of India:

The person whose unclaimed amount is transferred to the IEPF, can make an application by filing Form IEPF-5 with the IEPF authority set up by MCA that shall further process the application. Application can also be made by any legal representative of the deceased person.

IEPF authority may seek necessary clarifications from the concerned Company/Bank.

If any investor approaches the company for the amount transferred to IEPF, the following procedures are to be followed:

- Form IEPF-5 is required to be filed pursuant to sub-section (3) of section 125 of the Companies Act, 2013 and rule 7(1) of the Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016. (Login to MCA website [FO Login (mca.gov.in)] and access IEPF-5 Web Form under *MCA Services-IEPF related services*).

- Upon submission, Form No. IEPF-5 shall be transmitted online to the Nodal Officer of the company for verification of claim.

- claimant after making an application in Form No. IEPF-5, shall send original debenture certificate, along with Indemnity Bond, Advance Receipts, any other document as enumerated in Form No. IEPF-5, duly signed by him, to the Nodal Officer of the concerned company at its registered office for verification of the claim.

- The Nodal officer will file a verification report after the verification of claim

5. POLICY REVIEW

This Policy shall be subject to review as may be deemed necessary by the Board and to comply with any regulatory amendments or statutory modifications and subject to the necessary approvals of the Board of Directors.

Annexure – I

To,
Company Secretary and Compliance Officer
Manappuram Finance Limited,
W-4/638A, Manappuram House,
P O Valapad, Thrissur 680567.

Sub: Request letter for release of unclaimed amount from Escrow Account

Name of Investor	
Name of claimant (in case of legal heir/successor/nominee)	
Date of claim	
ISIN of the Security	
Name of the Security	
Description of the claim (Interest/Dividend/Redemption amount)	
Details of Security	
Amount unclaimed	
Email id	
Bank Account details (in which the unclaimed amount is to be transferred)	
Bank Name	
Branch Name	
Bank Account Number	
Name of Account Holder	
Bank IFSC Code	

(Name and signature of the Investor/Claimant)

Enclosure:

- Copy of Updated Client Master List (CML) attested by Claimant and Depository Participant.

- Self-attested copy of PAN Card
- Self-attested copy of Adhar Card
- Cancelled Cheque leaf or copy of the first page of the Bank Passbook
- Attachment as per applicability:
  a. Notarised copy of death certificate*;
  b. Succession document;**

*Self-attested copy of Verifiable Death Certificate of the deceased holder/if copy of Death Certificate is not Verifiable claimant needs to submit the original or notarised copy of Death Certificate of the deceased holder.

**Any ONE of the following succession documents:
Copy of Will as may be applicable in terms of Indian Succession Act,1925, along with a notarized indemnity bond from the legal heir(s)/claimant(s) to whom the securities have to be transmitted OR Legal Heirship Certificate or its equivalent issued by relevant authority which will mean a revenue authority not below the rank of a Tehsildar or equivalent authority, along with a notarized indemnity bond from the legal heir (s)/claimant(s) to whom the securities have to be transmitted;
OR Copy of Succession certificate or Letter of Administration or Court Decree.