

# ***POLICY FOR PROCESSING UNCLAIMED AMOUNTS***

*Approved by the Board of Directors at its meeting held on February 29, 2024*

## 1 BACKGROUND

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

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

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.

## 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 Five-Star Business Finance Limited.

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

“**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.

“**Stock Exchange**” shall mean the stock exchange designated by the Company for the securities.

## 3 OBLIGATIONS OF THE COMPANY

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.

The payment shall be based on BENPOS provided by RTA, received through the Depositories.

On non-availability of adequate information to make payment or rejection of payment by the bank, the Company shall take the following steps:

- A. Email the investor at the email id available in the benpos shared by RTA, requesting for the correct banking details to initiate the payment again.

- B. If email id not available, contact the investor on the contact number in the benpos shared by RTA, requesting for the correct banking details to initiate the payment again.

If, after sending the email or contacting the investor, details are not received from Investor within 30 days from due date, 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, within a period of thirty days of transferring the unclaimed amount to the escrow account, upload details on its website in the format specified by the Board.

#### **4 NODAL OFFICER**

The Company Secretary and Compliance Officer shall act as nodal officer and point of contact for Investors entitled to claim their unclaimed amounts.

Name, designation and contact details of Nodal officer are available in the investor section of the Company's website [www.fivestargroup.in](http://www.fivestargroup.in).

#### **5 PROCESS FOR MAKING CLAIM BY INVESTORS**

- A. Investor/ Claimant can approach the company directly or through an intermediary (trustee, RTA, brokers, etc) via email, phone etc for claiming the unclaimed/rejected/returned amounts.
- B. The Investor/Claimant shall be required to submit a claim as per **Annexure I** and below documentation for the company to trace the amount/claim due to them:

**In case of claim by Investor directly:**

The claim application (*Refer Annexure I*) shall be accompanied by following documents:

- a) Self-attested Transaction statement
- b) Client Master Copy (CML) in which securities were maintained
- c) Self-attested PAN copy
- d) Self-attested address proof
- e) Cancelled cheque leaf of the bank account in which the investor is willing get the unclaimed amounts credited.

**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:

a) In case if claimant is a Nominee

- Self- attested Client master copy (with nominee details) \*
- Transaction statement self-attested by Claimant
- Death certificate from Municipal authority
- Self-attested PAN copy of Claimant
- Self-attested address proof
- Cancelled cheque leaf of the bank account in which the investor is willing get the unclaimed amounts credited.

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

b) In case if claimant is a legal heir:

- Self- attested Client master copy
- Transaction statement self-attested by Claimant
- Death certificate from Municipal authority
- Self-attested PAN copy of Claimant
- Self-attested address proof
- Cancelled cheque leaf of the bank account in which the claimant is willing get the unclaimed amounts credited.
- Legal heir certificate attested by Notary Public
- Notarised No-objection certificate executed by non-claiming legal heir.
- Indemnity Bond executed in non-judicial stamp paper.

- C. 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 for a period of seven years from the due date of such transfer shall be transferred along with the interest accrued, if any thereon, to Investor Education and Protection Fund (IEPF) constituted in terms of Section 125 of the Companies Act 2013.

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

D. Following claims are liable to rejected by the Company:

- 1) Claims not supported by prescribed documents.
- 2) False claims
- 3) Duplicate claim
- 4) Claims beyond the period of seven years from the due date of such transfer to escrow account of the Company
- 5) Unclaimed amounts/interest or principal have been remitted to the Investor/claimant previously

E. The Company shall within a period of seven (7) days from date of receipt of the claim verify the authenticity & communicate through email or other written communication, the status of claim to the claimant/Investor. 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. The claimant/Investors are required resubmit the application within thirty (30) days from the date of receipt of such communication, failing which the claim may be rejected. However, the rejection of claim does not debar an investor from making fresh claim.

#### **F. 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 following official for any queries/clarification relating to their claim:

**Designation:** Company Secretary & Compliance Officer

**Contact:** 044 4610 6260

**Email id:** [cs@fivestargroup.in](mailto:cs@fivestargroup.in)

**Annexure I**

**Format for submitting claim under Regulation 61A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Name of Claimant:	
Category: (Self/legal heir/ nominee)	
Status (Corporate/entity/Individual)	
PAN	
Address:	
Landline/Mobile number:	
Bank details (Bank account number, Name of Bank, IFSC Code, Branch address) in which amount to be transferred/refund.	

<i>S.No</i>	<i>ISIN</i>	<i>Number of securities held</i>	<i>DP ID &amp; Client ID</i>	<i>Unclaimed amount (Rs)</i>	<i>Nature (Interest/Principal)</i>	<i>Due date of payment</i>