

<b>Reference</b>	VTPL/UDP/01	Version: January 31, 2024
<b>Policy Title</b>	Policy for processing and claiming of unclaimed amount (“ <b>Policy</b> ”)	
<b>Entity</b>	Vikas Telecom Private Limited	

<b>Revision History</b>		
<b>Version #</b>	<b>Version Date</b>	<b>Change Type</b>
V1	January 31, 2024	Created

<b>Document Review Cycle</b>			
<b>#</b>	<b>Effective Date</b>	<b>Next review date</b>	<b>Policy Owner</b>
1	January 31, 2024	Q4 Board Meeting Date of every Financial Year	Company Secretary and Compliance Officer

<b>Applicability</b>	This policy is applicable to Vikas Telecom Private Limited.
<b>Introduction</b>	<p>This Policy has been formulated to prescribe the framework for dealing with unclaimed amounts lying with Vikas Telecom Private Limited (“<b>Company</b>”) and the manner of claiming such amounts by the holders of non-convertible securities of the Company (referred to as “<b>Holders</b>”) in accordance with the provisions of the circular SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 08, 2023 (“<b>Circular</b>”), issued by the Securities and Exchange Board of India (“<b>SEBI</b>”) read with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“<b>LODR Regulations</b>”), as amended from time to time.</p> <p>Regulation 61A(2) of the LODR Regulations provides that, <i>‘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:</i></p> <p><i>Provided that the interest/ dividend/ redemption amount that is unclaimed and outstanding for a period of less than seven years as on the date of notification of this sub-regulation shall be transferred to the escrow account within thirty days, where it shall remain for the intervening period up to seven years’.</i></p> <p>Subsequently, SEBI through the Circular has prescribed the procedural framework for dealing with unclaimed amounts lying with the listed entity and the manner of claiming such amounts by the Holders.</p> <p>The details mentioned in this Policy shall apply to the transfer of unclaimed amounts initially to an Escrow Account, and subsequently to the Investor Education and Protection Fund constituted in terms of Section 125 of the Companies Act, 2013 and claim thereof by the Holders.</p>

<p><b>Transfer of unclaimed amounts</b></p>	<p>A. <b><u>Transfer of amounts to the Escrow Account, in case of interest/redemption payment related to non-convertible securities:</u></b></p> <ul style="list-style-type: none"> <li>➤ Where any interest/ redemption amount in case of non-convertible securities has remained unpaid or unclaimed within thirty days from the due date of interest/ redemption payment, the Company shall, within seven days from the date of expiry of the said period of thirty days, transfer such unclaimed amounts to an escrow account to be opened by the Company in any scheduled bank; and</li> <li>➤ Within thirty days of transferring unclaimed amounts to the Escrow Account, the Company shall update the “Unclaimed amounts” section of its website (“Section”) with the necessary details prescribed as per the Circular.</li> </ul> <p>B. <b><u>Transfer of amounts to the Investor Education and Protection Fund (“IEPF”):</u></b></p> <ul style="list-style-type: none"> <li>➤ Any amount transferred to the Escrow Account of the Company as aforesaid, which remains unpaid or unclaimed for a period of seven years from the due date of such transfer, shall be transferred by the Company, along with interest accrued, if any, thereon, to the IEPF within a period of thirty days from the date of expiry of seven years; and</li> <li>➤ Within thirty days of transferring amounts to the IEPF, the Company shall update the Section, with the necessary details prescribed as per the Circular.</li> </ul>
<p><b>Process and Manner for claiming amounts</b></p>	<ul style="list-style-type: none"> <li>➤ Utilizing the search feature under the Section given on the website of the Company (search criteria includes PAN / Date of Birth or DP ID / Client ID), the Holders shall check if any amount remains unclaimed/unpaid to them.</li> <li>➤ Upon searching, should the Holders discover any unclaimed amounts corresponding to them, they are required to furnish to the Company and RTA, the duly executed form and relevant details along with the supporting documents as mentioned in <b>Annexure A (Part A)</b> of this Policy to <a href="mailto:embassy.reit@kfintech.com">embassy.reit@kfintech.com</a> with a copy to <a href="mailto:gautham.n@embassyofficeparks.com">gautham.n@embassyofficeparks.com</a></li> </ul>
<p><b>Timeline for submission of claim by the Holders</b></p>	<p>Holders of non-convertible securities can submit claims for amounts that they were unable to receive or that remain unclaimed, covering any period starting from September 2022.</p>
<p><b>Processing of claims and rectification procedure</b></p>	<ul style="list-style-type: none"> <li>➤ The Registrar and Transfer Agent of the Company (“RTA”), shall on behalf of the Company, facilitate the processing of claims received from the Holders.</li> <li>➤ Upon receipt of a claim application, the RTA/Company shall verify the</li> </ul>

	<p>documentation and satisfy itself of the correctness of information submitted.</p> <ul style="list-style-type: none"> <li>➤ If the RTA/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, the RTA/Company will intimate the Holder, of such need for information or defects or incompleteness, by e-mail or other written communication within thirty days of receipt of a claim.</li> <li>➤ The RTA/Company will direct the Holders to furnish such additional information or to rectify such defects or incompleteness and 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.</li> <li>➤ <b><u>On the occurrence of the following circumstances, the RTA/ Company will reject the claim:</u></b> <ul style="list-style-type: none"> <li>A. In case the claim has been previously processed or settled; and</li> <li>B. In case the claim is unspecific or incorrect.</li> </ul> <p>However, rejection of the claim does not prevent a Holder from filing a fresh claim.</p> </li> </ul>
<p><b>Timeline for processing claims</b></p>	<ul style="list-style-type: none"> <li>➤ <b><u>Timeline for processing for claims associated with funds held in the Escrow Account:</u></b> <p>The Company shall, within thirty days of receipt of a claim application or complete information as called upon by the Company/RTA, remit the payment to the Holder using electronic modes for funds transfer.</p> </li> <li>➤ <b><u>Timeline for processing for claims associated with funds held with the IEPF:</u></b> <ul style="list-style-type: none"> <li>A. The Company shall, within thirty days of receipt of a claim application or complete information as called upon by the Company/RTA, make an application to IEPF, on behalf of the Holder, in the format as prescribed in the respective Circular; and</li> <li>B. The Company shall, within seven working days of receipt of the amount from IEPF, remit the payment to the Holder using electronic modes for funds transfer.</li> </ul> </li> </ul>
<p><b>Contact information for queries and grievances regarding claims</b></p>	<p>Holders may contact the Nodal Officer of the Company at [phone number] or [email ID] and raise their queries or grievances, if any, relating to their claim.</p>
<p><b>Process of claim by the Legal Heir/ Successor/Nominee</b></p>	<p>The provisions in respect of the Holder shall apply, mutatis mutandis, to the legal heir/ successor/ nominee of such Holder. The legal heir/ successor/ nominee shall satisfy the provisions specified under the LODR Regulations and circular issued thereunder, for the transmission of non-convertible securities of the Company</p>

	<p>and/or the corresponding claim thereon, as applicable.</p> <p>They are required to furnish to the Company and RTA, the duly executed form and relevant details along with the supporting documents as mentioned in <b>Annexure A (Part A and Part B)</b> of this Policy to <a href="mailto:embassy.reit@kfintech.com">embassy.reit@kfintech.com</a> with a copy to <a href="mailto:gautham.n@embassyofficeparks.com">gautham.n@embassyofficeparks.com</a></p>
<p><b>Processing of claims in special circumstances</b></p>	<p>In case the Company is part of a scheme of arrangement, amalgamation, merger, etc., the resultant entity shall become liable to discharge the obligations of the Company, in respect of unclaimed amounts.</p>
<p><b>Amendments and review</b></p>	<p>This Policy will stand amended to the extent of any change in applicable law. The Policy shall be annually reviewed by the Board of Directors of the Company to assess its effectiveness.</p>

**Application cum Undertaking**
**PART-A**

To,  
 KFin Technologies Limited,  
 Unit: Vikas Telecom Private Limited,  
 Selenium Building, Tower-B,  
 Plot No. 31 & 32, Financial District,  
 Nanakramguda, Hyderabad, Telangana 500032

Cc: Vikas Telecom Private Limited  
 Royal Oaks, Embassy Golflinks Business Park  
 Off Intermediate Ring Road, Bangalore, Bengaluru-560071, Karnataka

**Subject: Regarding Unclaimed Amounts**

Dear Sir/Madam,

Please see below the details regarding Unclaimed Amounts due to me:

Name	
Permanent Account Number (PAN) (mandatory in case of Indian national)	
Passport Number (mandatory in case of foreign national)	
Address	
Mobile Number (with code)	
Email Id	
DPID / Client ID	
Details regarding Unclaimed Amounts	<ol style="list-style-type: none"> <li>1. Category- Interest/ Redemption/ Any other:</li> <li>2. Date when the amount became due:</li> <li>3. Amount due (in INR) (including interest, if any):</li> <li>4. Quarter and/or Financial Year to which the Unclaimed Amounts pertain to:</li> </ol>
Bank details for initiating direct credit of Unclaimed Amounts	<ol style="list-style-type: none"> <li>1. Name of the Bank:</li> <li>2. Branch Address:</li> </ol>

	3. Branch Code: 4. Account type: 5. Account number: 6. IFSC Code:
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Please attach the following documents with this application:

1. Declaration that the above claim has not been made earlier or received refund.
2. Copy of self-attested proof of identity-
  - i. PAN Card of the claimant and if there are joint holders, of all joint holders.
  - ii. Passport, OCI, PIO, duly apostatized as per the laws of their country, in case of foreigners and NRI.
3. Copy of self-attested proof of address (not older than two months)-
  - i. Aadhar Card, any other valid proof issued by the government clearly mentioning the address of the claimant, or any latest utility bill, not older than two months, of the claimant and if there are joint holders, of all joint holders.
  - ii. Passport, OCI Card, PIO Card, any other valid proof issued by the government clearly mentioning the address of the claimant, or any latest utility bill, not older than two months, all duly apostatized as per the laws of their country, in case of foreigners and NRI.
4. Proof of entitlement of securities of the Company.
5. Cancelled cheque for the bank account where payment is to be made (payment will be credited to the bank account registered with demat account).
6. Copy of updated client master list of demat account of the claimant.
7. An indemnity Bond by the claimant, executed on a non-judicial stamp paper of appropriate value of provided under the Stamp Act of respective state. For claim of an amount upto INR Rs.10,000/-, indemnity bond can be provided on a plain paper.

### **PART-B**

In addition to the above, the following needs to be provided:

**In case of Registered Nominee -** The claimant is required to register transmission with the Company by providing the following documents as per SEBI Guidelines:

- i. Duly signed transmission request form by the Nominee, along with KYC documents
- ii. Original death certificate of the investor or copy of death certificate attested by the nominee subject to verification with the original or copy of death certificate duly attested by a notary public or by a gazetted officer.

**In case of legal heir/ successor, where no nomination has been made –**

- i. Duly signed transmission request form ISR-5 by the legal heir/ claimant, along with his KYC documents;
- ii. Original death certificate of the investor or copy of death certificate attested by the legal heir/ claimant subject to verification with the original or copy of death certificate duly attested by a notary public or by a gazetted officer;
- iii. a notarized affidavit from all legal heir(s)/claimant(s) made on non-judicial stamp paper of appropriate value, to the effect of identification and claim of legal ownership to the securities;
- iv. Indemnity Bond by the claimant;
- v. Succession Certificate/ Legal Heir Certificate/ Will/ Probate of Will or letter of administration etc., attested by the claimant, subject to verification with the original or duly attested by a notary public or by a gazetted officer; and
- vi. Where no document as listed in point v is executed, a no objection certificate from other legal heirs and relinquishment deed in favour of claimant, etc.

I solemnly declare that whatever is stated herein above is true and correct.

Name:

Signature:

Date:

Place: