

# **Truhome Finance Limited**

*(formerly Shriram Housing Finance Limited)*

## **Framework for transfer of unclaimed amounts to Escrow Accounts and Policy for Claiming unclaimed Interest or Principal on Non-Convertible Debentures**

**Owner:** Secretarial Team  
**Version no.:** 1.0

## INDEX

<b>Sr. No.</b>	<b>TABLE OF CONTENTS</b>	<b>Pg. No.</b>
1	Preamble, Background and Applicability	3
2	Definitions	4
3	Procedure and documentation for claiming the unclaimed interest/ redemption amount	5
4	Timelines for submission of claim	6
5	Obligations of the Company	7
6	Policy Review	11
7	Interpretation	11

## **Framework for transfer of unclaimed amounts to Escrow Accounts and Policy for Claiming unclaimed Interest or Principal on Non-Convertible Debentures**

### **PREAMBLE:**

Regulation 61A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI Listing Regulations**”), provides for dealing with unclaimed Non-Convertible Securities (“**NCS**”) and benefits accrued thereon.

In order to comply with the provisions of Chapter XIII on ‘Procedural framework for dealing with unclaimed amounts lying with entities having listed non-convertible securities and manner of claiming such amounts by investors’ of the Master Circular for listing obligations and disclosure requirements for Non-convertible Securities, Securitized Debt Instruments and/ or Commercial Paper issued by SEBI on May 21, 2024, this policy is being put in place to specify the process to be followed by the investors for dealing with unclaimed amounts lying with entities having listed Non-Convertible Securities and manner of claiming such amounts by investors and for transfer of unclaimed amounts to Escrow Accounts by Truhome Finance Limited (*formerly Shriram Housing Finance Limited*) (“**Company**” or “**Truhome**”).

### **BACKGROUND:**

As per Regulation 61A of the SEBI Listing Regulations, where the interest/ dividend/ redemption amount has not been claimed within thirty days from the due date of interest/ dividend/ redemption payment, the Company shall within seven days from the date of expiry of the said period of thirty days, transfer the amount to an Escrow Account. Any amount transferred to the Escrow Account in terms of Regulation 61A (2), remaining unclaimed for a period of seven years shall be transferred to Investor Education and Protection Fund’ (IEPF) constituted in terms of section 125 of the Companies Act, 2013.

Through this framework, the Company is required to ensure that a suitable mechanism exists for transfer of unclaimed amounts to Escrow Accounts and claim thereof by investors.

### **APPLICABILITY:**

To entities having listed non-convertible securities with interest/ dividend/ redemption amount which has not been claimed within thirty days from the due date of interest/ dividend/ redemption payment.

This policy provides framework for:

- dealing with unclaimed interest and redemption amounts, if any arising out of issue of NCDs;
- ensuring all claims in relation to unclaimed amounts raised by the Investors are resolved on time; and
- ease of access to information and documents required to claim the unpaid/ unclaimed amount of interest or/and redemption amount on maturity of NCDs or both which they are entitled to claim as per extant regulations.

## **DEFINITIONS:**

- a) **“Company”** means Truhome Finance Limited (*formerly Shriram Housing Finance Limited*).
- b) **“Escrow Account”** means an existing account and/or new account to be opened by the Company with any scheduled bank to transfer the unclaimed amount with respect to Non-Convertible Debentures.
- c) **“Investors”** means Debenture holders of the Company.
- d) **“Framework”** or **“policy”** means the framework for claiming unclaimed amounts by investors of the Company.
- e) **“Investor Education and Protection Fund”** (‘IEPF’) means IEPF constituted in terms of Section 125 of the Companies Act, 2013.
- f) **“Unclaimed Amounts”** means the amounts which was not claimed within thirty days from the due date of interest/redemption payment.
- g) **“Privately placed NCDs”** means Non-Convertible Debenture issued by way of private placement which are listed and rated.

## **PROCEDURE AND DOCUMENTATION FOR CLAIMING THE UNCLAIMED INTEREST / REDEMPTION AMOUNT OF NON-CONVERTIBLE SECURITIES ISSUED BY THE COMPANY:**

### **Submission of claim by the investor**

Investor may send a request letter (*by e-mail or hardcopy*) to the Company or to the respective Registrar and Share Transfer Agent (“**RTA**”), requesting them to release the unclaimed amount by mentioning the Folio number/ Client ID & DP-ID and the period for which the same has not been received/ claimed by attaching the following documents to enable Company / RTA to verify and thereafter release the entitled amount, as applicable.

Investors shall share the details of the unclaimed amounts to the company for tracing the amount / claim due to them. Alternatively, the investors can also check whether any unclaimed interest/ principal is due to be payable to them from the details uploaded by the Company on its website.

Upon receipt of a claim submitted by the Investors, the company or the RTA will check the correctness of the documents and shall process the claim within 30 days from the date of receipt of complete information as called from the investor.

If at the time of the claim by investors, the company finds the documents or details submitted by the beneficiary to be unsatisfactory or that the details shared by the beneficiary, do not match with the records of the company, then the company at its discretion, reject such claim or ask for additional clarifications and/or proofs, documents etc.

**The list of documents required to be submitted by the beneficiaries in support of the claim:**

**Claim by Investor:**

1. Request as per *Annexure I* duly sent by the beneficiary by mentioning the Client ID & DP ID
2. Proof of Identity – self attested copy of PAN Card
3. Proof of address – self attested copy of Aadhaar Card / Passport / Driving License / Voter id\*
4. Passport, OCI and PIO card in case of foreigners and NRI
5. Self-attested Copy of the updated Client Master List (CML)
6. Proof of entitlement (Bonds/Debentures/Fixed Deposit receipts/Certificate of share/Interest warrant/Dividend warrant, Application No./Statement of transaction etc.)
7. Cancelled Cheque leaf or copy of the first page of the Bank Passbook
8. For institutional Investors constitutional documents and scanned copy (PDF/ JPG Format) of the relevant board resolution/authority letter, etc by Authorized Signatories
9. An indemnity bond as per *Annexure B* on non-judicial stamp paper of INR 100/-.
10. Such other documents as may be necessary and required by the Company/ RTA

**Claim by nominee / legal heir:**

1. Request as per *Annexure I* duly sent by the beneficiary by mentioning the Client ID & DP ID
2. Proof of Identity – self attested copy of PAN Card
3. Proof of address – self attested copy of Aadhaar Card / Passport / Driving License / Voter id\*
4. Passport, OCI and PIO card in case of foreigners and NRI
5. Certified Copy of Client Master List (“CML”) of the Demat account of Late [Deceased Person's Full Name]
6. Certified Copy of Demat account's CML (of the legal heir/nominee) with updated Bank Details.
7. Proof of entitlement (Bonds/Debentures/Fixed Deposit receipts/Certificate of share/Interest warrant/Dividend warrant, Application No./Statement of transaction etc.)
8. Cancelled Cheque leaf or copy of the first page of the Bank Passbook
9. For institutional Investors constitutional documents and scanned copy (PDF/ JPG Format) of the relevant board resolution/authority letter, etc by Authorized Signatories
10. Copy of probate of will (or) legal heirship certificate (or) Succession Certificate (or) letter of administration (or) Court decree
11. Notary/attested copy of the death certificate of Late [Deceased Person's Full Name]
12. Proof of completion of transmission/nomination;
13. Notarized Affidavit Cum Indemnity Bond from all legal heirs on non-judicial stamp paper of Rs. 100/-
14. Original Notarized No Objection Certificate from all other legal heirs/nominee, allowing the interest/redemption amount to be credited in your applicant.

Note: The legal heir/ successor/ nominee shall satisfy the conditions/ provisions specified under the SEBI Listing Regulations and circulars issued thereunder, for the transmission of non-convertible securities and/ or the corresponding claim thereon, as applicable.

Above is an indicative list of documents required for processing the unclaimed interest/redemption amount. The Company and RTA reserves its right to seek additional documents on case-to-case basis as it may deem fit in this connection.

### **Rejection and refiling of the claim**

The Company/ RTA may reject the investor's claim for the following reasons:

- Amount has already been paid.
- Details in the proofs does not match with the details recorded with the Company/ RTA.
- Bank account particulars not matching with the investor's records with the Company.
- The documents required for transmission are not provided by the investor.
- The form is either incomplete or unsigned.
- The amount is already transferred to Investor Education and Protection Fund (IEPF).

After correcting the inaccuracy that the RTA/Company communicated, the investor may refile the claim by submitting the required documentation as asked for the claim's processing.

The request for claim along with the necessary documents mentioned above may be sent to the company or to the Registrar and Transfer Agent (RTA) as per details given below:

### **TIMELINES FOR SUBMISSION OF CLAIM**

- Investors to claim interest/redemption amount within 30 days from the due date of interest/redemption payment, failing which the Company shall transfer the amount to Escrow Account within 7 days from expiry of the said period of 30 days.
- Upon receipt of a claim application, the Company/RTA, 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/RTA 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 30 days from the date of receipt of such communication, failing which the claim may be rejected.
- The Company shall within 30 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 from its Escrow Account using electronic modes of funds transfer.
- Request for release of such unpaid amount will be entertained only if all the details of the investor(s) i.e. signature, address and Bank details are matching with the details registered with Company/RTA
- Investors will be intimated by the Company upon processing of the payment.
- Rejection of claim does not debar an investor from filing a fresh claim.
- Mode of communication: Physical letters and e-mail based on registered address along with the payment details.

## **AMOUNT TRANSFERRED TO IEPF**

In case unclaimed interest/dividend/redemption amount has been transferred to the IEPF, the process can be followed by following the IEPF rules mentioned on the website [www.iepf.gov.in](http://www.iepf.gov.in)

## **OBLIGATIONS OF THE COMPANY**

### **Transfer of unclaimed amounts to Escrow Accounts:**

In terms of Regulation 61A (2) of the LODR Regulations, the Company shall, within seven days from the date of expiry of the said period of thirty days from the due date of payment, transfer the unclaimed amounts to an Escrow Account to be opened by it in any scheduled bank.

### **Interest in case of default:**

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

### **Designating Nodal Officer:**

The Company shall designate a 'Nodal Officer', a person who may either be a Director, Chief Financial Officer, Company Secretary or Compliance Officer of the Company. Such officer shall be the point of contact for investors entitled to claim their unclaimed amounts, SEBI, Stock Exchange(s) and Depositories.

The Company shall display the name, designation and contact details of the Nodal Officer on its website. 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.

The Company has designated the Company Secretary as the Nodal officer for the said purpose.

Additionally, the Secretarial team shall communicate with the debenture holders of the Company to view and redress the grievances in a timely manner and to send timely communications to the debenture holders in terms of the payment of interest and/or redemption payments, sending financials communication, and such other tasks as may be necessary in this regard.

**Display of information with respect to unclaimed amounts by Company on the website:**

The Company, shall, within a period of thirty days of transferring the unclaimed amount to the Escrow Account, upload details on its website as given below:

<i>ISIN</i>	<i>Amount lying unclaimed (in INR)</i>	<i>Category (Interest/ Dividend/ Redemption amount)</i>	<i>No. of investors</i>	<i>Date when amount became due (dd/mm/yy yy)</i>	<i>Date when unclaimed amount was transferred to Escrow Account (dd/mm/yy yy)</i>	<i>Date when amount is to be transferred to IPEF (dd/mm/yy yy)</i>

Name and designation of the Nodal Officer:

Email ID and phone no.:

**Search facility for investor:**

The Company shall provide a search facility on its website 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 may be based on combinations, such as:

- PAN and Date of birth; or
- Name and Depository Participant Identification (DP ID)/ Client Identification (Client ID)

**Information of unclaimed amount:**

Upon such search, the following information shall be visible to the investor:

- Amount due to the investor on the date of payment (in INR);
- Category - interest/ dividend/ redemption amount;
- Date when amount became due (dd/mm/yyyy);
- Amount (in INR) transferred to Escrow Account (including penal interest, if any, for delay in transfer by the Company);
- Date when unclaimed amount was transferred to Escrow Account (dd/mm/yyyy);

**Processing of claim by Company:**

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. However, rejection of claim does not debar an investor from filing a fresh claim.



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.

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

**Maintenance of records:**

Further, the interest, if any, in the Escrow Account, that accrues to the investor in proportion to his/ her unclaimed amount, may also be disclosed by the Company.

**Update of information:**

Any change in the information uploaded on the website shall be updated by the Company by the seventh day of the succeeding month.

**Annexure A**

Date: \_\_\_\_\_

To,  
Nodal Officer  
Truhome Finance Limited (*formerly Shriram Housing Finance Limited*)  
Level 3, Wockhardt Towers, East Wing, C-2, G Block,  
Bandra Kurla Complex, Bandra (East), Mumbai, 400051

**Subject:** Credit of unclaimed interest/ principal amount  
**Ref:** Non-Convertible Debentures issued by Truhome Finance Limited

Dear Sir/ Madam,

I/ We, \_\_\_\_\_ am /are holding Non-Convertible Debentures (“NCDs”) issued by Truhome Finance Limited (*formerly Shriram Housing Finance Limited*) as per the details enumerated below:

Sr. No.	Details	Particulars
1	Name of the Applicant	
2	Type of applicant (investor/ on behalf)	
3	ISIN	
4	Amount remaining unclaimed – Principal	
5	Amount remaining unclaimed - interest	
6	Email id	
7	Phone no.	
8	Date of birth/ date of incorporation	
9	PAN	
10	Aadhar	

With reference to the various reminders by the Company and/or telephonic conversation with the official of the Company, we request you to credit the unclaimed amount in the Bank Account, details of which are given as below:

Name of the Bank	
Branch	
Type of Account	
Account Number	
IFSC Code	
MICR Code	

Please find enclosed herewith the following documents to enable the Company to process the Unclaimed Amount (Please mention and/or select applicable documents):

1. Self-attested PAN Card Copy and Aadhar Card;
2. Certified copy of the updated Client Master List (CML) with your revised/correct bank details
3. Cancelled Cheque from the same bank account which is getting reflected in the revised CML
4. Original Demand draft
5. An indemnity bond (Draft attached) on non-judicial stamp paper of Rs. 100/-
6. \_\_\_\_\_
7. \_\_\_\_\_
8. \_\_\_\_\_
9. \_\_\_\_\_
10. \_\_\_\_\_

Request you to process the credit of the unclaimed amount.  
Thank You.

Yours faithfully  
Sign/-

Name of Investor  
Contact Details:

**POLICY REVIEW:**

The Policy shall be reviewed by the Board at least annually and updated accordingly.

In case of any subsequent changes in the provisions of the SEBI Regulations or other applicable laws, the relevant amended provisions would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law.

**INTERPRETATION:**

Any ambiguities, interpretative issues, difficulties will be resolved by the Board of Directors of the Company in line with the broad intent of this Policy read with the applicable provisions of applicable SEBI Regulations.

In case any amendments, clarifications, circulars and guidelines as issued by the regulatory body(ies)/authority(ies) and such amendments, clarifications, circulars and guidelines are not consistent with the requirements specified under this Policy, then the provisions of such amendments, clarifications, circulars and the guidelines shall prevail and accordingly this Policy shall stand amended effective from the date as laid down under such amendments, clarifications, circulars and guidelines

### Sign-off History

Version Number	Sign-off Details	Name	Sign-off Date
1.0	Prepared By	Puja Shah	July 9, 2025
	Reviewed By	Gauri Shankar Agarwal	July 21, 2025
	Recommended By	Stakeholders Relationship Committee	July 28, 2025
	Approved By	Board of Directors	July 29, 2025