

Internal Policy for the process of verification of Unclaimed Interest/Redemption amount of Non- convertible Securities



Version	Approval/Revision Date	Review Date	Approved/Approved by	Frequency of the meeting	Next review date
V1	07 th February 2025		Respective Committee and/or Board of Director	Annually or as and when required	07 th February 2026

1. INTRODUCTION

Regulation 61A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**'LODR 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...'*

Further pursuant to SEBI vide circular no. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 08, 2023 (the **'SEBI Circular'**) mandates a listed entity to create a framework for defining the manner of transfer of such unclaimed amount as referred above by a listed entity to an Escrow Account and manner of claim thereof by investors.

The policy has been formulated in compliance with the SEBI Circular for providing internal framework in dealing with claims of the unclaimed interest and/or principal amount.

2. OBJECTIVES OF THE POLICY

To provide a process to be followed for verification of claims for the unclaimed interest/redemption amount by the debenture holder/beneficiary including the documents to be taken into account, facility check status of claim by investors, details to be provided on websites, maintenance of record, assigning roles and responsibilities to departments and Nodal officer.

3. DEFINITIONS –

- 3.1 **"Act"** means the Companies Act, 2013.
- 3.2 **"Applicable Law"** means the Companies Act, 2013 ("the Act") and the rules made there under, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (including any modifications/ re-enactments thereof) and SEBI Circular no. SEBI/HO/DDHS/DDHS-RAC- 1/P/CIR/2023/176 dated November 08, 2023 and includes any other Statutes, Laws, Rules, Circulars, Regulations, Guidelines or Standards under which the preservation of the Documents has been prescribed.
- 3.3 **"Board"** means the Board of Directors of the Company or its Committee.
- 3.4 **"Benpos"** refers to the beneficiary position received from Registrar and Transfer Agent (RTA) of the Company
- 3.5 **"Company"** means Krazybee Services Private Limited.
- 3.6 **"Escrow Account"** account opened by the Company in a schedule bank in pursuance with Regulation 61A of the LODR Regulations.
- 3.7 **"Facility Search"** means the search facility provided by the Company 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.
- 3.8 **"IEPF"** means an Investor Education and Protection Fund constituted under section 125 of the Companies Act, 2013
- 3.9 **"Nodal Officer"** means a person who may either be a Director, Chief Financial Officer, Company Secretary or Compliance Officer of the Company who shall be the point of contact for investors entitled to claim their unclaimed amounts for their queries or grievances, SEBI, Stock Exchange(s) and Depositories.

3.10 **“Regulations”** means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

3.11 **“Unclaimed amount”** refers to interest / principal amount due for payment that remains unclaimed by any debenture holder or any beneficiary within the stipulated time frame.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

4. Transfer of unclaimed amount to Escrow Account

4.1 As per the aforesaid SEBI circular and in terms of Regulation 61A (2) of the LODR Regulations, the Company is required to transfer, the Unclaimed Amounts to an Escrow Account to be opened by the Company with any scheduled bank, within seven days from the date of expiry of the thirty days from the due date of Interest/Redemption payment.

4.2 The details of such amount along with the debenture holder name shall be provided by the finance team of the Company to facilitate the Nodal Officer to comply with the abovementioned paras.

4.3 Company shall make all the efforts in making the payment of Unclaimed Amount.

4.4 In case a default is made in transferring the amount referred in paragraph 4.1 above or part thereof to the Escrow Account of the Company, then 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.

4.5 Detail of the escrow account opened by the Company is as follows;

Name of Bank: YES Bank Limited

Customer ID: 5339233

Account Name: Krazybee Services Pvt Ltd

Account Number: 059481300001034

IFSC Code: YESB0000022

4.5 Post transfer of amount to the escrow account, the Nodal officer shall coordinate with the Information & Technology team (IT Team) of the Company to place on the Company’s website the following details, within 30 days of transferring the unclaimed amount to the Escrow Account:

ISIN	Amount lying unclaimed (in INR)	Category (Interest/ Dividend/ Redemption amount)	No. of investors	Date when amount become due (dd/mm/yyyy)	Date when unclaimed amount was transferred to Escrow Account (dd/mm/yyyy)	Date when amount is to be transferred to IPEF (dd/mm/yyyy)
	...					
	...					
	Total					

Name and Designation of Nodal officer:

Email ID and Phone No.:

4.6 Any amount transferred to the Escrow Account in terms of Regulation 61A (3) remaining unclaimed for a period of 7 years, shall be transferred by the Company to the 'Investor Education and Protection Fund' constituted as per Section 125 of the Companies Act, 2013.

4.7 The amount required to be transferred as referred in para 4.6 shall be remitted in accordance with Section 125 of the Companies Act, 2013 and Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016 to the IEPF fund online along with a statement in Form No. IEPF 1 containing details of such transfer within a period of 30 days of such amounts becoming due to be credited to the IEPF Fund.

5. Process of verification of the claims for unclaimed amount from the Company

5.1 Any investor/nominee/legal heir/successor to the Estate of the Deceased/Administrator of the Estate of the Deceased claiming for the unclaimed amount shall make an application to the Company in the format as prescribed in **Annexure A** of this Policy.

5.2 Upon receipt of the application, the Nodal Officer shall within 10 days of receipt of application, initiate the verification of the documents submitted by the claimant along with the authenticity of the supporting documents shared with the application and shall complete such verification and remit the payment to the investor using electronic modes within 30 days of receipt of the application if found without any defect.

5.3 The Nodal Officer shall ensure that the bank account/KYC/PAN/Address provided in the Application is matching with the bank account/KYC/PAN/Address in their demat account maintained with their Depository Participant (DP).

5.3 Upon receipt of a claim application, if the Nodal Officer, 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 Nodal officer 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.

5.4 Nodal officer shall reject the claim on the following condition;

- a) Duplicate claim
- b) False claim
- c) Details provided by the claimant does not match with the Benpos provided by RTA
- d) Application is incomplete or unsigned
- e) The amount is already transferred to IEPF
- f) Breach of timeline for rectifying defect or incompleteness as communicated by the Company.

5.5 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.

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

6. Maintenance of records:

The Company shall preserve information pertaining to the unclaimed amounts of investors including relevant documentation. The Company shall furnish necessary information, as and when called for by the Board.

6. Process of claiming unclaimed amount from IEPF authority

6.1 Any amount transferred to the Escrow Account in terms of Regulation 61A (3) remaining unclaimed for a period of 7 years, shall be transferred by the Company to the 'Investor Education and Protection Fund'. In order to claim such amount the investor has to make an application the IEPF Authority in form "IEPF-5" available in the IEPF Website and the claim shall be processed as per the Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016.

7. Nodal Officer

7.1 Company Secretary of the Company shall be designated as the Nodal Officer. The Nodal officer shall be the point of contact for the investors for their queries or grievances, if any, relating to their claims, SEBI, Stock Exchange(s) and Depositories. The Nodal Officer shall performs all such duties as mentioned in this policy along with the provisions of Regulation 61A of the LODR Regulations including but not limited to updating information on the website of the Company, preservation of information pertaining to the unclaimed amounts of the investor including relevant documents.

Details of Nodal officer:

Name and designation of Nodal Officer: Pallavi Lingaraju, Company Secretary.

Email: legal@krazybee.com

Phone No: 9742148199

8. Search facility

8.1 The Nodal officer along with the help of IT Team and Finance team shall provide a search facility on the website of the Company for its investor to verify if there is any unclaimed amount due to them and lying in the Escrow Account. The search criteria may be based on combination as below;

a) PAN and Date of Birth; or

b) Name and Depository Participant Identification (DP ID) / Client Identification (Client ID)

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

a) Amount due to the investor on the date of payment (in INR);

b) Category -interest/ dividend/ redemption amount;

c) Date when amount became due (dd/mm/yyyy);

d) Amount (in INR) transferred to Escrow Account(including penal interest, if any, for delay in transfer by the Company);

e) Date when unclaimed amount was transferred to Escrow Account (dd/mm/yyyy);

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

9. Website Disclosure

9.1 The nodal officer shall along with the above mentioned details in para 4.5 also place the following details on the website of the Company;

- Name and contact detail of Nodal officer
- Updated Policy for Dealing and Claiming of Unclaimed Interest/Redemption amount of Non-convertible Securities
- Search facility
- Cumulative details of the number of claims received, processed, pending, etc

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

10. Manner of submission of claim by the investor

10.1 Any debenture holder claiming to be entitled to the unclaimed amount is required to check whether their bank account/KYC/PAN/Address have been updated in their demat account maintained with their Depository Participant (DP).

10.2 Any debenture holder/nominee/legal heir/successor to the Estate of the Deceased/Administrator of the Estate of the Deceased claiming for the unclaimed amount shall make an application to the company in the format as prescribed in Annexure A of this policy.

10.3 Upon receipt of a claim application in Annexure A, 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.

10.4 Condition for rejection of claim by the Company;

- a) Duplicate claim
- b) False claim
- c) Details provided by the claimant does not match with the Benpos provided by RTA
- d) Application is incomplete or unsigned
- e) The amount is already transferred to IEPF
- f) Breach of timeline for rectifying defect or incompleteness as communicated by the Company.

11. Review of the policy

11.1 The policy shall be reviewed by the Board from time to time as may be required.

Annexure A

(Format of application for claim)

To,

Company Secretary/Nodal Officer,

Krazybee Services Private Limited

3rd Floor, No. 128/9, Maruthi Sapphire,

HAL Airport Road, Murgesh Palya,

Karnataka, Bangalore – 560017

Sub: Unclaimed interest and / or redemption proceeds of debentures (ISIN:_____)

I/We, _____ [Name of the debenture holder], residing at _____ [address], wish to claim the unclaimed [interest and / or redemption] amount of the following debentures:

Or

In case claim is filed by legal heir(s)/successor(s) / nominee(s) of the debenture holder:

I/We, _____ [name of the legal heir(s)/successor(s) / nominee(s)*], acting in the capacity of _____ [Nominee/ Legal Heir/ Successor to the Estate of the Deceased/ Administrator of the Estate of the Deceased*] of _____ [Name of the deceased debenture holder], residing at _____ [address], wish to claim the unclaimed [interest and / or redemption] amount of the following debentures:

* strike whichever is not applicable

ISIN	
Series	
DP ID and Client ID	
Name of the first debenture holder	
Name of the second debenture holder	
No. of debentures held	
Unclaimed interest amount (in Rs.)	
Unclaimed redemption amount (in Rs.)	
Bank Account details (in which the Unclaimed Amount is to be transferred)	Bank Name: Branch Name: Bank Account number: Beneficiary Name: IFSC Code:
Email ID, if any	

Note: The bank account details and other details given above should match with the client master list.

I/We request you to process the claim and transfer the unclaimed interest and / or redemption amount (strike whichever is not applicable) in the abovementioned bank account.

Regards

Name:

Signature:

Date:

Additional Documents:

i) Updated Client Master List of the demat account of the investor, updated bank details, duly attested by the claimant and depository participant;

ii) Statement of holding of securities (Demat statement)

iii) Self-attested copy of:

- a) PAN Card/passport/OCI card issued by Ministry of Home affairs/Person of Indian Origin Card duly apostilled as per Hague Convention; and
- b) Aadhar Card (only in case of individuals)

iii) Original cancelled cheque leaf containing name of the debenture holder or Passbook duly attested by the Bank

iv) a) Certified copy of death certificate; and b) Will/Probate/Succession Certificate/Letter of Administration/ Legal Heirship Certificate (or its equivalent certificate)/ Court Decree, as applicable, shall also be submitted in case the application is made by Nominee/ Legal Heir/ Successor to the Estate of the Deceased/ Administrator of the Estate of the Deceased.