POLICY FOR FILING OF UNCLAIMED AMOUNTS BY INVESTORS OF NON-CONVERTIBLE SECURITIES

Table of Content

1. PREAMBLE

Light Microfinance Private Limited ("LMPL" or the "Company"), a Non-Banking Financial Company (NBFC) registered with the Reserve Bank of India (RBI), is committed to ensuring the timely identification, management, disclosure, and transfer of unclaimed amounts pertaining to investors of non-convertible securities in a transparent, accountable, and regulatory-compliant manner.

This Policy on Unclaimed Amounts of Investors of Non-Convertible Securities ("Policy") is framed in accordance with the applicable provisions of the Companies Act, 2013 and the rules made thereunder, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR Regulations"), and other applicable laws, rules, regulations, circulars, and regulatory requirements. In particular, this Policy has been formulated in accordance with SEBI Circular Ref. No. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 08, 2023**,** which prescribes the procedure to be followed by investors for claiming unclaimed amounts relating to non-convertible securities (NCS) and the benefits accrued thereon under the applicable laws. The Policy is based on the principles of transparency, equitable treatment of all investors, and regulatory compliance.

The Policy sets out the principles, procedures, and governance framework for the identification, maintenance, disclosure, investor communication, claim processing, transfer, and reporting of unclaimed interest, redemption amounts, and other amounts payable to investors in non-convertible securities. It also establishes the procedure to be followed by investors for claiming such unclaimed amounts and ensures that the Company adopts appropriate measures to safeguard investor interests while complying with all applicable statutory and regulatory requirements.

2. OBJECTIVES

This Policy aims to:

- Ensure compliance with the applicable provisions of the Companies Act, 2013, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, SEBI Circular No. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 08, 2023, the applicable SEBI Master Circular for Non-Convertible Securities, and other applicable laws, rules, regulations, circulars, and regulatory requirements, as amended from time to time.
- Establish a transparent and standardized framework for the identification, maintenance, disclosure, monitoring, and reporting of unclaimed interest, redemption amounts, and other amounts payable to investors in non-convertible securities.
- Prescribe a clear and efficient process for investors to claim unclaimed amounts and the benefits accrued thereon, ensuring timely processing of claims and equitable treatment of all investors.
- Define the roles and responsibilities of the Company's concerned departments in the administration, record maintenance, verification, processing, and settlement of claims relating to unclaimed amounts.
- Safeguard the interests of investors by ensuring transparency, accuracy, accountability, and adherence to applicable statutory and regulatory requirements in the management of unclaimed amounts.

3. APPLICABILITY

This Policy shall apply to all non-convertible securities issued by the Company in respect of which any interest, dividend (where applicable), redemption amount, or any other amount payable to investors remains unclaimed for a period of thirty (30) days from the respective due date of payment.

This Policy shall be effective from **March 1, 2024**, in accordance with the provisions of the aforesaid SEBI Circular and shall apply to all unclaimed amounts covered thereunder, as amended or modified from time to time.

4. DEFINITIONS

a) "Act" means the Companies Act, 2013 as amended, modified, supplemented or re-enacted from time to time;

b) "Applicable Laws" means all applicable statutes, acts, laws, ordinances, rules and regulations, binding judgements, decrees or orders issued by any judicial or quasi-judicial authority as in effect from time to time;

c) "Board of Directors" or "Board" means Board of Directors of the Company;

d) "Claimant" means and includes the Investor, legal heir, successors or permitted assigns of the Investor and such other person as may be permitted under the Applicable Laws;

e) Company means Light Microfinance Private Limited.

f) "Due Date" means the date from which interest or redemption amount is payable on the NCS;

g) "Financial Year" means the accounting year of the Company commencing on 1st April of each calendar year and ending on 31st March of the following calendar year;

h) "Investor Education and Protection Fund or IEPF" means the fund constituted in terms of Section 125 of the Companies Act, 2013;

i) "Investor(s)" means persons who have invested in any of the non-convertible securities of the Company;

j) "Nodal Officer" means the Nodal Officer as designated by the Company in terms of SEBI Circular;

k) "Non- Convertible Securities" or "NCS" means debt securities, non-convertible redeemable preference shares, perpetual non-cumulative preference shares, perpetual debt instruments and any other securities as specified by the Securities and Exchange Board of India as issued by the Company and listed on any of the recognized stock exchange;

l) "Unclaimed Amount" mean any interest, dividend, redemption amount with respect to any NCS held by the Investor which has become due to be paid to the Investor but which has not been paid or claimed within thirty days from the Due Date;

m) "SEBI" means the Securities and Exchange Board of India;

All words and expressions used in this Policy but has not been defined hereunder shall have the same meaning a respectively assigned to them in the Companies Act, 2013 and the rules or regulations framed thereunder or any statutory modification or re-enactment thereto, as the case may be.

5. OBLIGATIONS OF THE LISTED ENITY:

5.1 Transfer of unclaimed amount to Escrow Account:

In terms of Regulation 61A (2) of the SEBI LODR Regulations:

i. The Company shall open and maintain one or more Escrow Accounts (by whatever name called) with one or more scheduled banks for the purpose of holding such unclaimed amounts, in accordance with the applicable provisions of the SEBI LODR Regulations and other applicable regulatory requirements.

ii. The Company shall, within seven (7) days from the expiry of thirty (30) days from the due date of payment of any interest, dividend (where applicable), redemption amount, or any other amount payable in respect of non-convertible securities, transfer such unclaimed amount to an Escrow Account maintained with a scheduled bank.

5.2 Transfer To IEPF:

- Any amount transferred to the Escrow Account that remains unclaimed for a continuous period of seven (7) years from the date of such transfer shall be transferred by the Company to the Investor Education and Protection Fund (IEPF) constituted under Section 125 of the Companies Act, 2013, together with any interest or benefits accrued thereon.

5.3 Interest in case of default:

In the event the Company fails to transfer the unclaimed amount to the Escrow Account within the prescribed timeline, the Company shall be liable to pay interest at the rate of twelve per cent (12%) per annum on the amount that was required to be transferred, for the period of such default, in accordance with the applicable provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

5.4 Designating Nodal Officer:

Company Secretary of the Company shall act as a Nodal Officer and shall be the point of contact for investors entitled to claim their unclaimed amounts, SEBI, Stock Exchange(s) and Depositories.

Nodal Officer Details:

Name:	Ms. Madhavi Gajjar
Designation:	Chief Compliance Officer & Company Secretary
Email Id:	compliance@lightfinance.com
Contact details:	+91 8160987538
Correspondence Addresses:	1501, 15th Floor, Sankalp Square 3B, Sindhu Bhavan Road, B/s Hotel Taj Skyline, Shilaj, Ahmedabad – 380058

5.5 Display of information relating to unclaimed amounts on website:

The Company shall display details (as mentioned in “Annexure A”) relating to unclaimed amounts on its website within 30 days of transferring such amount to the Escrow Account, if required.

5.6 Search facility for investor(s):

The Company shall provide a search facility on its website for investor(s) to verify if there is any unclaimed amount due and lying in the Escrow Account of the Company based on their PAN and Date of Birth or Name and Depository Participant Identification/ Client Identification.

5.7 Information of unclaimed amount:

Upon search, the investor(s) will be able to view the following information:

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).

f. Penal Interest, if any, in the Escrow Account, that accrues to the investor.

6. PROCESS OF CLAIMING UNCLAIMED AMOUNTS BY INVESTORS:

6.1 Laws & Regulations:

Pursuant to Regulation 61A (2), where any interest, dividend, redemption amount, or any other amount payable in respect of non-convertible securities remains unclaimed for a period of thirty (30) days from the respective due date of payment, the listed entity shall, within seven (7) days from the expiry of such thirty-day period, transfer the unclaimed amount to an Escrow Account maintained with a scheduled bank.

Further, in accordance with Regulation 61A (3) of the SEBI LODR Regulations, any amount transferred to the Escrow Account that remains unclaimed for a continuous period of seven (7) years from the date of such transfer shall be transferred by the Company to the Investor Education and Protection Fund (IEPF) constituted under Section 125 of the Companies Act, 2013

6.2 Submission of Claim:

Any investor (including legal heir/ successor/ nominee of such investor) claiming their unclaimed amount lying with the Company may apply to the Company for payment of such amount, in the format enclosed as “Annexure B” to this Policy along with the supporting documents as prescribed in such annexure.

6.3 Category of Investor:

While submitting claims, the investor shall be required to clearly select appropriate category in which it is being claimed e.g. self / legal heir / nominee etc.

6.4 Documents required to be submitted in support of the claim:

The Investor shall submit the claim application/ request along with the following documents for verification:

a) a cancelled cheque/copy of Bank Passbook
b) proof of holding (Copy of Debenture Certificate / Demat holding Statement),
c) Self-certified copy of Identity Proof (PAN / Aadhar),
d) Address Proof (Voters ID Card, Passport)
e) Any other documents as and when required on case to case basis

If the claim is being submitted by the nominee/ legal heir of the investor, then the following documents shall be provided along with above-mentioned documents:

1. Duly signed transmission request form by the claimant.
2. Notarised copy of death certificate of security holder.
3. Self-attested copy of Government ID proof of claimant.
4. Original security certificate (In case of securities held in physical mode)
5. Copy of transaction statement duly attested by Claimant (In case of securities held in demat mode).
6. No Objection Certificate (NOC) from other heir(s), if applicable
7. Notarised Will or Succession Certificate
8. Any other documents as and when required on case to case basis

6.5 Manner of submission of claim by the Security Holder:

The investor may submit their claim either physically addressed to the Nodal Officer at its registered office or over the e-mail at email ID provided at the website of the Company (www.lightfinance.com), along with prescribed supporting documents.

6.6 Timeline within which the investor can submit documents, provide clarifications, etc.

i. 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.

ii. Upon receipt of a claim application, 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.

iii. 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 30 days from the date of receipt of such communication, failing which the claim may be rejected.

iv. Rejection of claim does not debar an investor from filing a fresh claim.

v. 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.

vi. Investors will be intimated by the Company upon processing of the payment.

vii. Mode of communication: Physical letters and e-mail based on registered address along with the payment details.

viii. The Investors shall claim their unclaimed interest / principal upon maturity within 7 years from the due date of the payment post which the amount shall be transferred to IEPF authorities.

6.7 Contact details (email ID and phone number) wherein investor can raise their queries or grievances, if any, relating to their claim:

- Investor can raise their queries or grievances, if any, relating to their claim by contacting on email ID and phone number as specified on the website of the Company (www.lightfinance.com).

6.8 Website:

- This policy is available on the website of the Company (www.lightfinance.com).

7. POLICY REVIEW

This Policy shall be reviewed from time to time as may be required based on regulatory developments.

Annexure-A

ISIN	Amount lying unclaimed Including penal interest, if any (in INR)	Category (Interest/ Dividend/ Redemption amount)	No. of investors	Date when amount became due (dd/mm/yyyy)	Date when unclaimed amount was transferred to Escrow Account (dd/mm/yyyy)	Date when amount is to be transferred to IEPF (dd/mm/yyyy)
	Total					

Name and designation of the Nodal Officer:

Email ID and Phone No.:

Annexure-B

Date: ____________________

To,

Light Microfinance Private Limited,
1501, 15th Floor, Sankalp Square 3B,
Sindhu Bhavan Road, B/s Hotel Taj Skyline,
Shilaj, Ahmedabad – 380058

Subject: Claiming unpaid amount

Dear Sir / Madam,

I/We, ________________________________, am/are holding Non-Convertible Debentures ("NCDs") issued by Light Microfinance Private Limited ("the Company"), as per below details:

ISIN No.	DPID-Client ID	Certificate Nos	No. of debentures	Face Value (in Rs.)

We/I request you to credit the unclaimed amount in the Bank Account, details of which are given as below:

Bank Name	Branch Name	Account No.	IFSC Code	MICR no

Please find enclosed herewith the following documents to enable the Company to process the Unclaimed Amount:

1. Self-attested PAN Card Copy and Aadhar Card.
2. A cancelled cheque/copy of Bank Passbook.
3. Self-attested Copy of the updated Client Master List (CML).
4. Proof of holding (Copy of Debenture Certificate / Demat holding Statement).

Request you to process the credit of the unclaimed amount.

Thank You.
Yours faithfully

Sign/-
Name of Investor
Address:
Contact Details: