

HALDIA PETROCHEMICALS LIMITED

‘POLICY FOR DEALING WITH UNCLAIMED INTEREST / REDEMPTION AMOUNT ON NON-CONVERTIBLE SECURITIES’

APPLICABILITY:

As per the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”) where any interest /redemption amount has not been claimed by any Non-Convertible Debenture Holders (“Investors”) within the prescribed timeline and remains unclaimed shall be transferred to the ‘Investor Education and Protection Fund’ (“IEPF”) constituted in terms of Section 125 of the Companies Act, 2013 (the “Act”).

Further, SEBI vide its circular dated 8th November, 2023 mandates the Company to formulate a policy standardizing the process to be followed by investors for claiming their unclaimed amounts. The said Policy is consequently required to be displayed on its website.

SCOPE:

This Policy sets out the procedural framework to be followed by investors for claiming their unclaimed amount.

DEFINITIONS:

“Act” shall mean the Companies Act, 2013, as amended from time to time and Rules made there under.

“Company” shall mean Haldia Petrochemicals Limited.

“Client ID” for a demat account is a unique identification number assigned to an individual or entity by a depository participant.

“Depository” shall have the same meaning as assigned to it under section 2(1)(e) of the SEBI Depositories Act, 1996 or any amendments thereof.

“Depository Participant” shall have the same meaning as assigned to it under section 2(1)(g) of the SEBI Depositories Act, 1996 or any amendments thereof.

“Folio No.” for a physical security holder is a unique identification number assigned to an individual or entity by the Company.

“Investor Education and Protection Fund” or **“IEPF”** is a fund established by the Central Government of India under Section 125 of the Companies Act, 2013..

Words and expressions used but not defined in this Policy shall have the same meaning assigned to them in the SEBI LODR Regulations or the Act and the rules / regulations made thereunder, as the case may be or in any amendment thereto.

TRANSFER OF UNCLAIMED AMOUNTS TO ESCROW ACCOUNT:

In terms of the provisions of SEBI LODR Regulations, if interest / redemption amount is not claimed within 30 days from the due date, the Company shall within 7 days after the 30 days period, transfer the amount to an escrow account in a scheduled bank.

Further, upon transferring any unclaimed amount to the Escrow Account, the Company shall also upload such details on the website of the Company, i.e. www.haldiapetrochemicals.com.

TRANSFER OF UNCLAIMED AMOUNTS TO IEPF:

Where any interest / redemption amount has been transferred to the Escrow Account, as aforesaid, remaining unclaimed for a period of 7 (seven) years shall be transferred to the IEPF.

APPOINTMENT OF NODAL OFFICER:

The Company Secretary, for the purpose of this Policy, is designated as the ‘Nodal Officer’ of the Company who shall be the point of contact for investors entitled to claim their unclaimed amounts, SEBI, Stock Exchange(s) and Depositories.

INVESTOR SERVICE AND GRIEVANCE HANDLING MECHANISM:

All investor service matters are being handled by KFin Technologies Limited, Registrar and Transfer Agent (“RTA”) of the Company, which discharges investor service functions of the Company effectively, efficiently and expeditiously. Investors can raise their queries or grievances, relating to their claim at the below address:

KFin Technologies Ltd.
Karvy Selenium Tower B, Plot No. 31-32,
Nanakramguda, Gachibowli,
Serilingampally, Hyderabad – 500 032, Telangana
Email id: einward.ris@kfintech.com
Tel No. : +91-40-67162222
Website: www.kfintech.com

Alternatively, the investors can also raise their queries or grievances, relating to their claim directly with the Nodal Officer at the below address:

The Company Secretary
Haldia Petrochemicals Limited
Bengal Eco Intelligent Park, Tower 1
Block EM, Plot No 3, Salt Lake City, Sector V,
Kolkata 700 091
Email id: investors@hpl.co.in
Tel No. : 7112 2334, 7112 2445
Website: www.haldiapetrochemicals.com

PROCEDURE FOR CLAIMING UNCLAIMED INTEREST / REDEMPTION AMOUNT BY INVESTORS, IN CASE THE SAME HAS NOT BEEN TRANSFERRED TO IEPF:

In case, an investor has not claimed / not been able to receive interest / redemption amount and which has not yet been transferred to the IEPF, the same can be claimed by following the below procedure:-

- Investors may send a request letter (by email or hardcopy) to the RTA or the Company requesting them to release the unpaid 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 RTA/Company to release the said amount: -

1. Self-attested copy of PAN;
2. Self-attested copy of Address Proof;
3. Cancelled Cheque*;
4. Updated Client Master List; and
5. Self-attested copy of Passport/OCI card/ PIO card (for Foreigners/ NRI).

**As per the applicable rules, the Company is obliged to pay interest/redemption amount on securities as per the bank account details registered with Depository Participant/Company/RTA. Therefore, investors are requested to keep their bank particulars updated.*

- In case of request for transmission, where the securities are held in single name with a nomination, the following documents are required to be submitted:

- a. Duly signed transmission request form by the nominee.
- b. Original death certificate 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.
- c. Self-attested copy of PAN of the nominee.

- In case claim is made by legal heir(s), where the securities are held in single name without nomination, the following documents are required to be submitted:

- a. A notarized affidavit from all legal heir(s) made on non-judicial stamp paper of appropriate value, to the effect of identification and claim of legal ownership to the securities.

However, in case the legal heir(s)/claimant(s) are named in the Succession Certificate or Probate of Will or Will or Letter of Administration as may be

applicable in terms of Indian Succession Act, 1925 or Legal Heirship Certificate or its equivalent certificate issued by a competent Government Authority, an affidavit from such legal heir(s)/claimant(s) alone shall be sufficient.

- b. Duly signed transmission request form by the legal heir(s)/claimant(s).
- c. Original death certificate or copy of death certificate attested by the legal heir(s)/claimant(s) subject to verification with the original or copy of death certificate duly attested by a notary public or by a Gazetted Officer.
- d. Self-attested copy of PAN of the legal heir(s)/claimant(s).
- e. A copy of Succession Certificate or Probate of Will or Will or Letter of Administration or Court Decree as may be applicable in terms of Indian Succession Act, 1925 or Legal Heirship Certificate or its equivalent certificate issued by a competent Government Authority, attested by the legal heir(s)/claimant(s) subject to verification with the original or duly attested by a notary public or by a Gazetted Officer.

In case where a copy of Will or a Legal Heirship Certificate or its equivalent certificate issued by a competent Government Authority is submitted, the same shall be accompanied with a notarized indemnity bond from the legal heir(s) /claimant(s) to whom the securities are transmitted, in the format as specified by SEBI, from time to time.

In case where a copy of Legal Heirship Certificate or its equivalent certificate issued by a competent Government Authority is submitted, the same shall also be accompanied with a No Objection from all nonclaimants, stating that they have relinquished their rights to the claim for transmission of securities.

- f. For cases where value of securities is up to Rs. 5 lakhs (in case of securities held in physical mode), and up to Rs. 15 lakhs per beneficial owner in case of securities held in dematerialized mode, as on date of application, and where the documents

mentioned in para (e) are not available, the legal heir(s) /claimant(s) may submit the following documents:

- i. no objection certificate from all legal heir(s) stating that they do not object to such transmission or copy of family settlement deed executed by all the legal heirs duly attested by a notary public or by a Gazetted Officer; and
- ii. notarized indemnity bond made on non-judicial stamp paper of appropriate value, indemnifying the Share Transfer Agent/ listed entity, in the format as specified by SEBI, from time to time.

Upon receipt of a claim application, if 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 resubmit such application or document(s) within 30 (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 / RTA shall within 30 (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. Request for release of 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.

PROCEDURE FOR CLAIMING UNCLAIMED INTEREST / REDEMPTION AMOUNT BY INVESTORS, IN CASE THE SAME HAS BEEN TRANSFERRED TO IEPF:

In case of an investor has not claimed interest / redemption amount and which has been transferred to the IEPF, the same can be claimed by following the indicative procedure:-

- Any investors whose unclaimed interest / redemption etc. has been transferred to IEPF, may apply for refund to the IEPF Authority by submitting an online application in Form IEPF-5 available on the website www.iepf.gov.in along with fee specified by the IEPF Authority, from time to time.
- Upon submission Form IEPF-5 shall be transmitted online to the Nodal Officer of the Company for verification of claim.

The claimant after making an application in Form IEPF-5 shall send updated Client Master List along with Indemnity Bond, Advance Receipts, other documents as enumerated in Form No. IEPF-5 duly signed by him, to the Nodal Officer of the Company at its registered office for verification of the claim.

- The Nodal Officer shall, within 30 (thirty) days from the date of receipt of claim, send an online verification report to the IEPF Authority after verification of details in Form No. IEPF-5.
- The claim will be verified by the IEPF Authority, and in case there is no discrepancy, the claim will be approved by the IEPF Authority and the unclaimed amount will be directly remitted to the bank account of the investor/claimant by the IEPF Authority.
- In case of any discrepancies, the IEPF Authority shall give intimation of such information called for or defects or incompleteness, by e-mail on the email address of the investor/claimant and the Company, directing the investor/claimant to furnish such information or to rectify such defects or incompleteness or to re-submit such application or e-Form or document within the prescribed statutory timelines.
- Upon receipt of such intimation from the IEPF Authority, the investor/claimant shall resubmit Form IEPF - 5 by furnishing such information or rectifying the defects or incompleteness as called for and the Company shall accordingly file a revised online verification report within the prescribed statutory timelines.

POLICY REVIEW:

This Policy was approved by the Board of Directors of the Company. The Board of Directors has the right to amend or modify this policy in whole or in part, at any time.

In case of any inconsistency between the said Act / Regulation and the provisions contained in this Policy, the Act shall prevail.
