

360 ONE Prime Limited

Policy for dealing with unclaimed Interest / Redemption amount on Non-Convertible Securities

Version	Prepared by	Approved By	Approval Date
V1	Compliance	Board	April 22, 2024

1. Background / Preamble

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 November 8, 2023 mandates the Company to formulate a policy standardizing the process to be followed by investors for claiming their unclaimed amounts.

2. Purpose

This policy specifies the process for dealing with unclaimed amounts of interest / redemption for Non-Convertible Securities and steps to be undertaken by the Company for processing claims of investors.

3. Definitions

Act refers to Companies Act, 2013 and any amendments made from time to time.

Applicable Laws refers to Companies Act, 2013, Listing Regulations and relevant SEBI Circulars and any other provisions as may be applicable.

Benpos refers to the Beneficiary position statement as received from the RTA of the Company on a record date.

Disclosure Document(s) refers to the Information Memorandum / Prospectus / General Information Document / Key Information Document / Placement Memorandum / Term sheet or any other document by whatever name called containing the terms and conditions in relation to the issuance of non-convertible securities.

Financial Year or FY refers to the Financial Year beginning from April of a year and March of the subsequent year.

IEPF means Investor Education and Protection Fund constituted in terms of Section 125 of the Companies Act, 2013.

Listing Regulations shall refer to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

RTA refers to the Registrar and Share Transfer Agent of the Company.

SEBI stands for Securities and Exchange Board of India.

Unclaimed Amount refers to the interest / principal amount which is due for payment but not claimed by the respective investor(s) within the stipulated period.

4. Transfer of unclaimed amounts

- 4.1 The interest / redemption monies that have remained unclaimed for more than thirty (30) days from the due date of payment must be transferred to an Escrow Account created with a scheduled bank within 7 days after the expiry of the 30-day period.
- 4.2 Where any interest/redemption amount has been transferred to the Escrow Account, as aforesaid, that remains unclaimed for 7 years shall be transferred to the IEPF.
- 4.3 The details of unclaimed interest / dividend / redemption payment with respect to the Securities of the Company shall, within a period of thirty days of transferring the unclaimed amount to the Escrow Account, be displayed on the website of the Company at <https://www.360.one/wealth-management/prime/> , as per the prescribed format by SEBI.

5. 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.

The Details of Nodal officer are as follows:

Company Secretary & Compliance Officer

Address: 360 ONE Centre,
Kamala City, Senapati Bapat Marg,
Lower Parel (West), Mumbai 400 013
Tel No.: 022 – 4876 5712
E-mail: nbfc-compliance@360.one

Investor can also contact Registrar and Share transfer agent of the Company and details of them are as follows:

Address: Link Intime India Private Limited
C 101, 247 Park, L B S Marg, Vikhroli West,
Mumbai 400 083
Tel No: 022 49186000 **Fax:** 022 49186060
E-mail: team.bonds@linkintime.co.in

6. Process for claiming unclaimed amounts by investors

In case unclaimed amount is not 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;

- 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:

1. Request letter duly sign by registered nominee / legal heir.
2. Updated Client Master List (CML copy) of registered nominee / legal heir.
3. Client Master List (CML copy) of deceased holder.
4. Holding cum transaction of the above mentioned demat account.
5. Notarized death certificate of deceased holder.

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.

In case unclaimed amount is transferred to IEPF

In case, an investor wishes to claim unclaimed amounts from IEPF may claim the same as per the provisions of Section 125 of Companies Act read with Rule 7 of Investor Education and Protection Fund Authority (Accounting, Audit, Transfer and Refund) Rules, 2016 as amended from time to time by submitting Form IEPF – 5 available on the website of IEPF Authority.

The Form IEPF – 5 shall be verified by the Nodal Officer of the Company who shall submit verification report to the Authority.

Based on the verification report submitted by the Company, the claim shall be processed / rejected by the Authority.

7. Review

This Policy shall be reviewed by the Board from time to time as may be required.