

MAHINDRA & MAHINDRA FINANCIAL SERVICES LIMITED

POLICY ON CLAIMING OF UNCLAIMED AMOUNTS BY NCS HOLDERS

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Owner	Company Secretary
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MAHINDRA & MAHINDRA FINANCIAL SERVICES LIMITED

POLICY ON CLAIMING OF UNCLAIMED AMOUNTS BY NCS HOLDERS

PREAMBLE & OBJECTIVE

Regulation 61A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('LODR Regulations'), inter alia, 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 to be opened by the Listed Entity in any Scheduled Bank.

Pursuant to point A(8) – Annex-A of SEBI circular No. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 08, 2023, effective 1st March 2024, on '**Procedural framework for dealing with unclaimed amounts lying with entities having listed non-convertible securities and manner of claiming such amounts by investors**', SEBI has mandated listed entity to formulate a Policy specifying the process to be followed by the investors for claiming their unclaimed amounts.

In compliance with the above, the Board at its meeting held on 30th January 2024 has adopted this Policy

DEFINITIONS

- a. "Applicable laws" shall mean to include Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, [including any amendments or re-enactments thereof], Rules/guidelines/ notifications/circulars issued by SEBI and any other regulation, rules, acts, guidelines as may be applicable;
- b. "Board" or "Board of Directors" shall mean Board of Directors of the Company, as constituted from time to time;
- c. "Company" shall mean Mahindra & Mahindra Financial Services Limited;
- d. "IEPF" shall refer to 'Investor Education & Protection Fund' constituted in terms of section 125 of the Companies Act, 2013;
- e. "Investor" shall mean holder of non-convertible securities
- f. "NCS" shall mean non-convertible securities;
- g. "Unclaimed amount(s)" shall mean amounts due to NCS holders, i.e. interest, dividend, redemption amounts which have not been claimed by such holder;
- h. "RTA" shall refer to the Registrar & Transfer Agent of the Company;
- i. "SEBI" shall mean Securities and Exchange Board of India.

All other definitions not defined herein shall apply as per applicable laws.

PROCESS TO BE FOLLOWED BY INVESTORS FOR CLAIMING THEIR UNCLAIMED AMOUNTS

For the purpose of funding its growth requirements, the Company issues NCS from time to time through Public Issue/ Private Placement of securities. Company shall make payment of interest/ dividend/ redemption amount(s) accrued on NCS issued by it, on the due date of such payment.

If interest/ dividend/ redemption amount(s) have not been claimed by the NCS holder 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 unclaimed amounts to an Escrow Account to be opened by it in any scheduled bank.

Upon, transfer of such amount(s) to the Escrow Account, the NCS holder can follow the process given hereunder to claim the unclaimed interest/ dividend/ redemption amount(s) due to him:

- **The format in which claim has to be submitted by the investor:**
The Investor is required to submit a request addressed to the Company / RTA along with the necessary supporting documents. The request should preferably be in the format enclosed herewith as **Annexure -A**.

- **The procedure and documentation (including supportings) for making claim, depending on whether the claim is being submitted by the investor – self or by the legal heir/ nominee/ etc. of the investor:**
 - 1. Investor is required to submit the below documents in case of a Self-Claim**
 - Documents required in case of Physical Holding* – Self attested Identity Proof, Address Proof & Cancelled Cheque., if KYC is updated.
 - Documents required in case of Demat Holding – Self attested Updated Client Master List (“CML”). CML can be procured from your Depository Participant.

*Additional documents (*to be submitted only by way of Post/Courier*) in case of Physical Holding if the following details are not updated:

Particulars	Click on the link below to access the Form
PAN, Contact details (postal address, Mobile number & E-mail), Bank details	ISR – 1 – Investor Service Request for registering details
Nominee details	SH – 13 – Nomination Form, SH – 14 – Cancellation or variation of Nomination, ISR – 3 – Opting out of nomination, (As applicable)
Signature	ISR – 1 – Investor Service Request for registering signature, ISR – 2 – Confirmation of Signature (As applicable)

2. Documents required in case of claims made by legal heir / nominee:

In case of claim made by legal heir/ nominee, they are required to complete the transmission/nomination by submitting the requisite documents in line with 'Chapter V – 20.' & 'Annexure 14' of SEBI Master Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2023/70 dated 17th May 2023 which can be accessed at the link <https://www.sebi.gov.in/legal/master-circulars/may-2023/master-circular-for-registrars-to-an-issue-and-share-transfer-agents-71271.html>.

In case of physical holding, legal heir/nominee is required to submit the documents for registration of transmission/nomination to the RTA/Company & in case of demat holding, they are required to submit the documents with their Depository Participant.

In case of demat holding, on completion of the transmission/nomination, the legal heir/nominee is required to submit the documents as specified in point no 1. above along with the following additional documents to the Company/RTA:

- a) Proof of completion of transmission/nomination;
- b) Death Certificate of the deceased investor;
- c) Updated Client Master List of the legal heir/nominee

• **Manner of submission of claim by the investor:**

Investor is required to send the documents mentioned above, as applicable

- a) Through Post/ Courier: Hard copies of self-attested documents; OR
- b) Through e-mail: Scan copies of self-attested documents from your registered e-mail ID.

Investor is required to send the submission at the following address:

RTA:

KFin Technologies Limited - Attn: Mr. Umesh Pandey
Unit: Mahindra & Mahindra Financial Services Limited
Selenium, Tower B, Plot No. 31-32,
Gachibowli, Financial District, Nanakramguda,
Hyderabad - 500 032
Ph: + 1800 309 4001;
Email: einward.ris@kfintech.com

OR

Company:

Mahindra & Mahindra Financial Services Limited – Attn: Mr. Swapnil Dahasahasra
Agastya Corporate Park Piramal,
Amiti Building, 3rd Floor,
B Wing, Sunder Bung Lane,
Kamani Junction, Kurla West,
Mumbai, Maharashtra - 400070
Ph: 022 6652 3531;
Email: mmfsl.debenturehelpline@mahindra.com

- Timeline within which the investor can submit documents, provide clarifications, etc. :**
The Company after verifying the documents may ask the investor for certain additional documents / clarification as a proof towards claim, to which the investor should respond within thirty days from the date of receipt of such communication, failing which the claim may be rejected.
- Conditions for rejection of claim and option of re-filing of a claim by the investor:**
The Company will verify the documents received from the investor and may reject the claim if the documents received are not in order / partial documents received from the investor, signature mismatch etc. within 30 days of receipt. However, rejection of claim does not debar an investor from filing a fresh claim.
- Timeline within which the claim shall be processed by the listed entity:**
The Company within thirty days of receipt of a claim application from an investor or complete information as called upon from the investor will remit the payment to the investor using electronic modes of funds transfer.
- Contact details (email ID and phone number) wherein investor can raise their queries or grievances, if any, relating to their claim:**

Name	Designation	E-mail ID	Contact Number
Ms. Brijbala Batwal	Company Secretary (Nodal Officer)	investorhelpline_mmfsi@mahindra.com	022 6652 6000
Mr. Swapnil Dahasahasra	Assistant Vice President - Treasury (Deputy Nodal Officer)	mmfsi.debtenturehelpline@mahindra.com	022 6652 3531

ACCESS TO DETAILS OF UNCLAIMED AMOUNTS ON COMPANY’S WEBSITE

The Company has on its website at the link: <https://www.mahindrafinance.com/investor-relations/debt-information#statements-of-unpaid-and-unclaimed-amounts> uploaded details of unclaimed amount(s) for investors to verify if there is any unclaimed amount due to them and lying in the Escrow Account of the Company.

TRANSFER OF UNCLAIMED AMOUNTS TO IEPF

As per Regulation 61A(3) of the LODR Regulations, any amount transferred to the Escrow Account in terms of Regulation 61A(2), remaining unclaimed for a period of seven years will be transferred to the ‘Investor Education and Protection Fund’ constituted in terms of section 125 of the Companies Act, 2013.

Even after transfer of unclaimed amount(s) to IEPF, Investor would be able to claim such amount(s) from IEPF.

MAINTENANCE OF RECORDS

The Company/RTA shall preserve all information pertaining to the unclaimed amounts of investors including relevant documentation required as per applicable law.

DISCLOSURES

The Company shall make appropriate disclosures in compliance with the provisions of the LODR Regulations, in particular the disclosures required to be made on the website of the Company and updates thereto.

DISSEMINATION OF THIS POLICY ON COMPANY'S WEBSITE

This policy would be available on the Company's website and the link to the policy is: <https://www.mahindrafinance.com/investor-relations/policy-and-shareholder-information#mmfsl-policies>.

SCOPE AND LIMITATION

Statutory/ regulatory provisions and any amendments thereon, made from time to time, as applicable to the Company shall be binding on the Company and will be complied even if the same are not specifically incorporated in this Policy.

In case of any conflict between the provisions of this Policy and statutory/ regulatory provisions or amendments thereof from time to time, the stricter provisions, compliant with the law shall prevail.

REVIEW

This Policy shall be reviewed once every 3 years or as and when deemed necessary.

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Annexure A

Request Letter for claiming unclaimed amount(s) by NCS holders

To
The Nodal Officer
Mahindra & Mahindra Financial Services Limited
Mumbai

REF : FOLIO/DPID/CLIENT ID : _____

I/ we request the Company to credit/ transfer all the unclaimed amount(s) of prior period(s) in respect of NCS held by me, pertaining to the captioned Folio, and lying with the Company, electronically to my bank account as per details submitted/ available with you or received by you from my depository participant.

I/we hereby confirm that I/we have not encashed, negotiated or otherwise dealt in any unclaimed amounts paid by the Company so as to create any adverse claim upon such amounts.

In consideration of you crediting the unclaimed amounts electronically to my bank account in lieu of the NCS warrant(s)/ demand draft(s) lying unclaimed/ unpaid in my/ our name(s) and which are irretrievable/ lost or misplaced, I/we hereby agree and undertake to hold the Company, its Directors and officers harmless and to keep them protected from/against all losses, costs or damages which they may sustain or incur by reason of the Company crediting the unclaimed amounts electronically, or by the original demand draft(s)/ NCS warrant(s) being, at any time, found and presented for payment by any person or persons claiming to be the holder(s) of the NCS warrant(s)/ demand draft(s) or in any way interested therein.

I/we further agree and undertake to return to you the original NCS warrants/ demand draft(s), should it be found by me/us or again come into my/our possession at any time hereafter.

	Name	Signature
First Holder:		
Second Holder:		
Third Holder:		
Address of First Holder:		
Witness 1		Witness 2
Name:		Name:
Address:		Address:
Signature:		Signature:

Date:

Note: 1. For this Request Letter to be considered as complete, please ensure the name and address of first holder and joint holders, if applicable, are filled correctly and it is duly signed by all the holders and 2 witnesses.

2. Enclose self- attested Client Master (if shares are held in Demat form) or Form ISR-1 along with self-attested copy of PAN Card, address proof and cancelled cheque (if shares are held in physical form).