



SHREM INFRA INVESTMENT MANAGER PRIVATE LIMITED
(Formerly Known as Shrem Financial Private Limited)

**POLICY ON FILING OF CLAIMS BY
UNITHOLDERS FOR UNCLAIMED AMOUNTS**

This Policy is approved by the Board of the Investment Manager with effect from 5th May 2025.

POLICY ON FILING OF CLAIMS BY UNITHOLDERS FOR UNCLAIMED AMOUNTS

1. BACKGROUND & OBJECTIVE

As per the Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014, as amended (“**InvIT Regulations**”), read with SEBI Circular No. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/178 dated November 8, 2023, the board of directors (the “**Board**”) of Shrem Infra Investment Manager Private Limited (the “**Investment Manager**”), being the investment manager of the Shrem InvIT (the “**Trust**” or “**InvIT**”), has formulated this policy on the filing of claims by unitholders for their unclaimed amounts transferred to the Unpaid Distribution Account (as defined below) or the Investor Protection and Education Fund (“**IPEF**”). This policy serves as a guideline and specifies the procedure (including the required documentation) to be followed by unitholders to claim their unclaimed amounts.

2. IMPORTANT DEFINITIONS

“**Applicable Law**” means any statute, law, regulation, ordinance, rule, judgement, order, decree, bye-law, approval of any governmental agency, directive, guideline, policy, requirement or other government restriction or any similar form of decision of or determination by, or any interpretation having the force of law of any of the foregoing governmental agency having jurisdiction, applicable to any party, in force from time to time, including but not limited to the InvIT Regulations

“**IPEF**” means the Investor Protection and Education Fund constituted by SEBI under the Securities and Exchange Board of India Act, 1992, as amended.

“**RTA**” means the Registrar and Unit Transfer Agent of the Trust.

“**Units**” means units representing an undivided beneficial interest in the Trust.

“**Unitholders**” means any person who owns Units of the Trust.

“**Unpaid Distribution Account**” means the escrow account opened by the Investment Manager on behalf of the Trust in any scheduled bank.

“**Unpaid/Unclaimed Amounts**” means amounts for which payment to any Unitholder has remained unpaid or unclaimed for the period specified under applicable law from the date of declaration.

3. NODAL OFFICER

The Compliance Officer of the Investment Manager has been appointed as the Nodal Officer for the purposes of this policy.

The contact details of the Nodal Officer are available on the website of the Trust at <https://www.shreminvit.com/>

In the event of a change in the Nodal Officer, the Investment Manager shall designate a new person within 15 days of such change.

4. TRANSFER OF UNPAID/UNCLAIMED AMOUNTS

Transfer of Unpaid/Unclaimed Amounts to the Unpaid Distribution Account

- 4.1. Where the Investment Manager has made a distribution on behalf of the Trust, but the payment to any Unitholder has remained unpaid or unclaimed, the Investment Manager shall transfer this Unpaid/Unclaimed Amounts to the Unpaid Distribution Account within seven working days from the date of expiry of prescribed period as specified under Regulation 18(6) (c) of the InvIT Regulation.
- 4.2. In case a default is made in transferring the Unpaid/Unclaimed Amounts or portion thereof to the Unpaid Distribution Account, the Investment Manager shall pay interest on the amount that has not been transferred to the Unpaid Distribution Account, for the period of default, i.e., from the date of default until the date of transfer to the Unpaid Distribution Account, at the rate of 12% per annum. Such interest amount shall accrue to the relevant Unitholder in proportion to the amount remaining unclaimed. The Investment Manager shall not recover such interest in the form of fees or any other form, payable to the Investment Manager by the InvIT.
- 4.3. Within 30 days of transferring Unpaid/Unclaimed Amounts to the Unpaid Distribution Account, the Investment Manager shall update the details of the “Unpaid/Unclaimed Amounts” on the website of the Trust in the manner prescribed under applicable law.
- 4.4. Any change in the information uploaded on the website of the Trust shall be updated by the Investment Manager by the seventh day of the succeeding month.

Transfer to IPEF

- 4.5. Any Unpaid/Unclaimed Amounts transferred to the Unpaid Distribution Account that remain unpaid or unclaimed for a period of seven years from the due date of such transfer, shall be transferred by the Investment Manager, along with interest accrued thereon (if any), to the IPEF within a period of 30 days (or such period as may be mandated by SEBI from time to time) from the date of expiry of the seven-year period. The Investment Manager shall provide information about the Unpaid Distribution Account transferred to the IPEF in the format prescribed under Applicable Law in the hard copy, addressed to Chief General Manager, Office of Investor Assistance and Education, SEBI and through email to ipef@sebi.gov.in.
- 4.6. In case a default is made in transferring the unclaimed amount to the IPEF, the Investment manager shall be liable to a penalty of one lakh rupees and in case of continuing failure, a further penalty of INR 500 for each day that the failure continues, subject to a maximum of INR 10 lakhs. The Investment Manager shall not recover such penalty in the form of fees or any other form, payable to the Investment Manager by the InvIT.
- 4.7. Within 30 days of transferring the amounts to the IPEF, the Investment Manager shall update details of the transfer on the website of the Trust in the manner prescribed under applicable law.
- 4.8. Any change in the information uploaded on the website of the Trust shall be updated by the Investment Manager by the seventh day of the succeeding month.

Search Facility

- 4.9. The Investment Manager shall provide a search facility on the website of the InvIT for Unitholders to verify if there is any unclaimed amount due to them and:

- a. lying in the Unpaid Distribution Account of the InvIT, or
- b. transferred to the IPEF.

4.10. The search criterion may be based on combinations, such as:

- a. PAN and Date of birth; or
- b. Name and Depository Participant Identification (DP ID)/ Client Identification (Client ID).

4.11. Upon such search, the following information shall be visible to the unitholder:

- a. Amount due to the unitholder on the date of declaration (in INR);
- b. Category - Interest/ Dividend/ Repayment of Capital/ any other;
- c. Date when amount became due (dd/mm/yyyy);
- d. Amount (in INR) transferred to Unpaid Distribution Account (including penal interest, if any, for delay in transfer by the Investment Manager);
- e. date when unclaimed amount was transferred to Unpaid Distribution Account (dd/mm/yyyy);
- f. The interest, if any, in the Unpaid Distribution Account, that accrues to the unitholder in proportion to his/ her unclaimed amount, may also be disclosed by the Investment Manager.

4.12. Further, information of the unclaimed amounts should include:

- a. Amount lying unclaimed in the Unpaid Distribution Account of the InvIT as at end of seven years (in INR);
- b. Break-up of interest/ dividend/ Repayment of Capital/ Any other;
- c. Date when amount became due for transfer to IPEF (dd/mm/yyyy);
- d. Amount (in INR) transferred to IPEF by the Investment Manager;
- e. Date when unclaimed amount was transferred to the IPEF by the Investment Manager (dd/mm/yyyy).

5. PROCESS AND MANNER FOR CLAIMING AMOUNTS

To ensure a standardized, smooth, and hassle-free claim process for the Unclaimed / Unpaid Amounts, Unitholders are required follow the below process and provide the specified documents:

5.1. When Claimant(s) is the Registered Unitholder of the Trust:

a. Verification of unclaimed amounts:

The Unitholders shall verify if there is any unclaimed amount due to them and lying in the Unpaid Distribution Account of the InvIT on the search facility on the website of the InvIT available at <https://www.shreminvit.com/>

b. Format for submission of claim and list of documents:

The unitholder(s) shall submit the claim for unpaid amounts in the format as prescribed in **Annexure A**.

c. *Manner of submission of documents:*

Unitholders(s) to approach the Nodal Officer of the InvIT or to the RTA, namely *MUFG Intime India Private Limited*, by sending the aforementioned documents via e-mail to the key contacts mentioned in **Annexure C**.

d. *Furnishing of information for defects or incompleteness:*

In case of any further information is required or if any defects or incompleteness is found in the documents upon examination, the Unitholder(s) shall be required to provide additional information, rectify defects or incompleteness, or re-submit such application or documents within thirty (30) days from the date of receipt of such communication from the InvIT.

Further, in case the additional details sought are not provided within thirty (30) days, the claim will be rejected, and the Unitholder will be required to file a fresh claim.

e. *Approval of Claims:*

The Investment Manager shall within thirty (30) days of receipt of a claim application from a unitholder and/ or receipt of complete information as called upon from the unitholder and upon the complete verification of such application, remit the payment to the unitholder using electronic modes for funds transfer.

f. *Rejection of Claims:*

On the occurrence of the following circumstances, the Investment Manager will reject the claim if: (a) the claim has been previously processed or settled; (b) the claim is unspecific or incorrect; or (c) the Unitholder fails to provide additional details within 30 days from the receipt of communication from the Investment Manager directing the Unitholder to furnish such information or to rectify such defects or incompleteness or to re-submit such application or documents. However, rejection of the claim does not prevent the Unitholder from filing a fresh claim.

g. *Documents required to be submitted along with the claim:*

The claimant(s) shall provide below appended list of documents mentioned as the case may be.

- Claim Form (Annexure A);
- Documentary proofs (as mentioned in Annexure A).
- Any other documents as required by the Nodal Officer/ RTA.

5.2. *When Claimant(s) is the Legal Heir / Successor / Nominee of the Registered Unitholder of the Trust:*

In case of transmission of units of the InvIT, whether the claimant is the Unitholder or legal heir / successor / nominee of such Unitholder of the Trust, shall submit all the documents as required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, from time to time ("**Listing Regulations**") and circulars issued thereunder, for the transmission of units of Trust and/ or the corresponding claim thereon, as applicable. The procedure as per the Listing Regulations for the transmission of units of Trust and/ or the corresponding claim thereon is indicated in **Annexure B**.

5.3. Processing of claims in special circumstances:

In case the Trust is part of a scheme of arrangement, amalgamation, merger, etc., the resultant entity/ Investment Manager of the resultant entity shall become liable to discharge the obligations of the Trust, in respect of Unpaid/Unclaimed Amounts.

6. MAINTENANCE OF RECORDS

The Investment Manager (on behalf of the Trust) shall preserve information pertaining to the Unpaid/Unclaimed Amounts of the Unitholders, including relevant documentation. The Investment Manager (on behalf of the Trust) shall furnish the necessary information, as and when called for by the SEBI.

7. COMMUNICATION OF THIS POLICY

This policy shall be posted, and be made available, on the website of the Trust i.e. <https://www.shreminvit.com/>

8. REVIEW OF THE POLICY

This policy will be reviewed and reassessed by the board of directors of the Investment Manager as and when required and appropriate recommendations shall be made by them to update this policy based on changes that may be brought about due to any regulatory amendments or otherwise.

9. AMENDMENT

This policy will always be deemed to be amended to the extent of, and incorporate by reference, any change in applicable law, including any amendment to the InvIT Regulations and the Listing Regulations, without the requirement of any action from the Investment Manager or approval of the Unitholders of the Trust.

ANNEXURE A

FORM OF APPLICATION TO BE MADE FOR MAKING CLAIM FOR THE UNCLAIMED/ UNPAID AMOUNT

I. Details of the Applicant:

- a. Category of the applicant: Individual OR Others
- b. First Name:
- c. Middle Name:
- d. Last Name:
- e. Father's first name:
- f. Father's Middle Name:
- g. Date of birth:
- h. Name of the InvIT:
- i. Address of the applicant:
- j. Phone (with STD / ISD code):
- k. Mobile No.:
- l. E-mail id:
- m. Permanent Account Number (PAN) (mandatory in case of Indian national):
- n. Aadhaar Number or passport / Overseas Citizenship of India (OCI) / Person of Indian Origin (PIO) Card no. (in case of NRI / Foreigners):
- o. DP ID:
- p. Client ID:

II. Account from which claim is being made:

- a. Unpaid Distribution Account
- b. Investor Protection and Education Fund

III. Details regarding Unpaid/Unclaimed Amounts:

- a. Category- Interest/ Distribution/Any other:
- b. Date when the amount became due:
- c. Amount due (in INR) (including interest, if any):
- d. Quarter to which the Unpaid/Unclaimed Amounts pertain to:
- e. Financial Year to which the Unpaid/Unclaimed Amounts pertain to:
- f. Reason for non-receipt:

IV. Bank details for initiating direct credit of Unpaid/Unclaimed Amounts:

- a. Name of the Bank:
- b. Branch Address:
- c. Branch Code:
- d. Account type:
- e. Account number:
- f. IFSC Code:

V. Any other relevant information:

VI. Declaration

- a. I solemnly declare that whatever is stated herein above is true and correct.
- b. The above claim has not been made earlier or received refund.

Signature:

Name:

Place:

Date:

Please submit the following documents with this application:

1. Original demand draft to the address communicated by the RTA.
2. Copy of self-attested proof of identity:
 - a) Aadhaar Card and PAN Card of the claimant and if there are joint holders, of all joint holders.
 - b) Passport, OCI, PIO, duly apostatized as per the laws of their country, in case of foreigners and NRI.
3. Copy of self-attested proof of address (not older than two months):
 - a) Aadhaar Card, any other valid proof issued by the government clearly mentioning the address of the claimant, or any latest utility bill, not older than two months, of the claimant and if there are joint holders, of all joint holders.
 - b) Passport, OCI Card, PIO Card, any other valid proof issued by the government clearly mentioning the address of the claimant, or any latest utility bill, not older than two months, all duly apostatized as per the laws of their country, in case of foreigners and NRI.
4. Cancelled cheque for the bank account where payment is to be made (payment will be credited to the bank account registered with demat account).
5. Copy of updated client master list of demat account of the claimant.
6. Transaction Statement evidencing their holding.
7. An indemnity Bond by the claimant, executed on a non-judicial stamp paper of appropriate value as provided under the Stamp Act of respective state in case the claims exceed INR 10,000. For claims amounting to INR 10,000 or less, the indemnity bond may be provided on plain paper.

ANNEXURE B

PROCEDURE AS PER THE SEBI LISTING REGULATIONS FOR THE TRANSMISSION OF UNITS OF TRUST AND/ OR THE CORRESPONDING CLAIM

The claimant(s) shall follow the aforementioned steps and additionally provide below appended list of documents and / or such other documents required under the Listing Regulations and the circulars issued thereunder, each as amended.

A. In case of transmission of securities, where the securities are held in single name with nomination, the following additional documents shall be submitted:

1. Duly signed transmission request form ISR-5 by the nominee;
2. Self-attested copy of the PAN card of the nominee.
3. Any one of the following documents:
 - a. Original death certificate; or
 - b. Copy of death certificate attested by the nominee subject to verification with the original; or
 - c. copy of death certificate duly attested by a notary public or by a Gazetted Officer;

B. In case of transmission of securities, where the securities are held in single name without nomination, the following additional documents shall be submitted:

1. Notarized Affidavit from all the legal heir(s) / successor(s) made on non-judicial stamp paper of Rs.100/- to the effect of identification and claim of legal ownership to the securities.

[In case the legal heir(s) / successor(s) are named in the succession certificate or probate of will or will or letter of administration or legal heirship certificate (or its equivalent certificate issued by a competent government authority), a notarized affidavit from such legal heir(s) / successor(s) alone shall be sufficient.]

2. Duly signed transmission request form ISR-5 by the legal heir(s)/claimant(s);
3. Self-attested copy of the PAN card of the legal heir(s)/claimant(s);
4. Any one of the following documents:
 - a. Original death certificate; or
 - b. Copy of death certificate attested by the legal heir(s)/claimant(s) subject to verification with the original; or
 - c. copy of death certificate duly attested by a notary public or by a Gazetted Officer;
5. Copy of succession certificate or probate of will or will or letter of administration or court decree as may be applicable in terms of the 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 gazette officer

[Provided that in a 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 specified by the SEBI.

Provided further that in a 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 non-claimants, duly attested by a notary public or by a gazetted officer; stating that they have relinquished their rights to the claim for transmission of securities.]

C. If the market value of securities of the InvIT as on the date of submission of claim is up to Rs.15 Lakhs (where the securities held in demat mode) and where the documents set out in (b) are not available, the legal heir(s)/claimant(s) may submit the following documents:

1. No Objection Certificate from all legal heirs(s), or copy of family settlement deed executed by all the legal heir(s), duly attested by a notary public or by a gazetted officer; and
2. Notarized Indemnity Bond made on non-judicial stamp paper of Rs.500/- indemnifying the InvIT in the format specified by the SEBI.

[Note: This format is illustrative and is subject to amendment. Additionally, upon submission, the Nodal Officer will review the format and ascertain whether further requirements are necessary.]

ANNEXURE C

KEY CONTACTS

Nodal Officer:

Compliance Officer

Email ID: compliance.team@shreminvit.com

Contact No.: +91 22 42285500/55

Address: 1001, 10th Floor, Viraj Towers, Jn of Andheri Kurla Road, W. E. Highway, Andheri (East), Mumbai- 400093

RTA:

MUFG Intime India Pvt Ltd.

Ajit Patankar

Email: mumbai@in.mpms.mufg.com

Contact No.: 022 - 4918 6000

Address: C 101, 247 Park, LBS Marg, Surya Nagar, Gandhi Nagar, Vikhroli West, Mumbai- 400083