

BIRLA CORPORATION LIMITED

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

1 Preamble:

- 1.1 Birla Corporation Limited's Policy for dealing with unclaimed Interest/Dividend/Redemption Amount on Non-Convertible Securities (hereinafter referred to as the "Policy") has been framed in compliance with the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the SEBI Circular No. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated 8th November, 2023 and provisions of the Companies Act, 2013 read with the rules framed thereunder.
- 1.2 This Policy provides procedural framework to be followed by investor(s)/claimant(s) of Non-Convertible Securities for claiming their unclaimed Interest/Dividend/Redemption amount.

2 Definitions:

The definitions of some of the key terms used in this Policy are given below:

- A. Act** means the Companies Act, 2013, as amended from time to time and Rules made there under.
- B. Listing Regulations** means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.
- C. Company** means Birla Corporation Limited.
- D. Client ID** for a demat account holder is a unique identification number assigned to an individual or entity by a depository participant.
- E. Folio No.** for a physical security holder is a unique identification number assigned to an individual or entity by the Company.
- F. 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.
- G. 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.
- H. 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.

I. Unclaimed amount means unclaimed interest/ dividend/ redemption amount for non-convertible securities.

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

3 Transfer of Unclaimed Amounts to Escrow Account:

In terms of the provisions of Listing Regulations, where interest/dividend/redemption amount on listed Non-Convertible Securities has not been claimed within 30 days from the due date of interest/dividend/redemption payment, the Company shall within 7 days from the expiry of 30 days period transfer the unclaimed amount to an Escrow Account opened by the Company with any scheduled bank.

Upon transferring the unclaimed amount to the Escrow Account, the Company shall upload the details of the unclaimed amounts on its website in the format as prescribed by SEBI from time to time.

4 Transfer of Unclaimed Amounts to IEPF:

Where any amount that has been transferred to the Escrow Account which remains unclaimed for a period of 7 years from the date of such transfer, shall be transferred to the IEPF in terms of the provisions of Section 125 of the Act.

5 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 SEBI, Stock Exchange(s), Depositories and investors entitled to claim their unclaimed amounts.

6 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. Investors can raise their queries or grievances, relating to their claim at the below address:

KFin Technologies Limited
(Unit: Birla Corporation Limited)
Selenium Building, Tower B, Plot No. 31-32,
Nanakramguda, Serilingampally,
Hyderabad – 500032, Telangana
Email id: einward.ris@kfintech.com
Tel No. : +91-40-67162222, 1800 309 4001 (Toll Free)
Website: www.kfintech.com

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

The Company Secretary

Birla Corporation Limited,
Birla Building, 3rd Floor, 9/1 R.N. Mukherjee Road,
Kolkata - 700 001
Email: investorsgrievance@birlacorp.com

7 Procedure for claiming unclaimed amount by investors in case the same has not been transferred to IEPF:

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

Investor can send a request letter physically signed or through his registered email id to the RTA/Company requesting them to remit the unclaimed amount by mentioning the Folio number/Client ID & DP ID and the period for which the same has not been received/claimed together with the KYC documents as prescribed by the SEBI from time to time to enable the RTA/Company to remit the said amount including: -

1. Self-attested copy of PAN;
2. Self-attested copy of Address Proof;
3. Cancelled Cheque*;
4. Self attested Updated Client Master List; (for demat account holders); 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.

7.2 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 along with Original Security Certificates.
- 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.
- d) Updated Client Master List of the nominee (for demat account holders).

7.3 In case of request for transmission, where the securities are held in single name without a nomination, the following documents are required to be submitted:

- a) Duly signed transmission request form by the legal heir(s)/claimant(s) along with Original Security Certificates.
- b) 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.
- c) Self-attested copy of PAN of the legal heir(s)/claimant(s).
- d) Updated Client Master List of the legal heir(s)/claimant(s) (for demat account holders).
- e) 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 or Legal Heirship Certificate or its equivalent certificate issued by a competent Government Authority, an affidavit from such legal heir(s)/claimant(s), duly notarized, alone shall be sufficient.

- f) A copy of Succession Certificate or Probate of Will or Will or Letter of Administration or Court Decree 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 non-claimants, duly attested by the notary public or Gazetted Officer stating that they have relinquished their rights to the claim for transmission of securities.

- g) 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. a notarized indemnity bond made on non-judicial stamp paper of appropriate value, indemnifying the RTA/ Company, in the format as specified by SEBI, from time to time.
 - ii. 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.

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(s)/legal heir(s)/claimant(s), of such need for information or defects or incompleteness, by e-mail or other written communication. The Company/RTA shall direct the investor(s)/legal heir(s)/claimant(s) to furnish such information or to rectify such defects or incompleteness or to re-submit 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(s)/legal heir(s)/claimant(s) from filing a fresh claim.

The Company/RTA shall within 30 (thirty) days of receipt of a claim application complete in all respect shall remit the payment to the investor(s)/legal heir(s)/claimant(s) using electronic modes of funds transfer.

8 Procedure for claiming unclaimed amount by investor/claimant in case the same has been transferred to IEPF:

In case an investor/claimant has any unclaimed amount which has been transferred to the IEPF, the same can be claimed by following the indicative procedure: -

- 1) The investor/claimant shall first apply to the Company for issuance of "Entitlement Letter". The Entitlement Letter shall contain the details of unclaimed amount that the investor/claimant is entitled to claim from the IEPF.
- 2) After obtaining the Entitlement Letter, the investor/claimant shall file Form IEPF-5 with the Ministry of Corporate Affairs, for refund of the unclaimed amount from the IEPF.
- 3) Upon filing of Form IEPF-5, the claimant shall send original bond/ deposit certificate/ debenture certificate, updated Client Master List as the case may be, along with Indemnity Bond and any other documents as enumerated in Form IEPF-5, duly signed by him, to the Nodal Officer of the Company at its registered office for verification of the claim.
- 4) The Nodal Officer shall within 30 (thirty) days from the date of filing of Form IEPF-5, submit an Online Verification Report with the IEPF Authority making its recommendation of approval/rejection of Form IEPF-5 filed by the investor/claimant.
- 5) On the basis of the recommendation made by the Company in the Online Verification Report the IEPF Authority will process the claim of the investor/claimant 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.
- 6) 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.
- 7) 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.

9 Policy Review

This Policy shall be reviewed by the Board as and when required. Any changes or modification to the Policy shall be placed before the Board of Directors for their approval.

10 Miscellaneous

In case of any subsequent changes in the provisions of the Act or the Listing Regulations which makes any of the provisions in the Policy inconsistent with the Act or the Listing Regulations, then the provisions of the Act or the Listing Regulations would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with the Act or the Listing Regulations.

Date of Original adoption / Revision	Effective date of the Policy
6th February, 2024	6th February, 2024