Policy Title	**Policy on filing of claims by Debenture Holders for unclaimed amounts ("Policy")**
Entity	South City Projects (Kolkata) Private Limited *(formerly known as South City Projects (Kolkata) Limited)* ("**Company**")
Effective Date	From the date of approval by the Board of Directors of the Company i.e., August 3, 2026.
Applicability	This Policy is applicable to the debenture holders of the Company in respect of interest / redemption amounts that remain unclaimed or unpaid.
Introduction	In terms of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)) Regulations, 2015, including any amendment thereof ("SEBI Listing Regulations"), read with SEBI Circular No. SEBI/HO/DDHS/DDHS-PoD-1/P/CIR/2025/0000000103 dated July 11, 2025 ("SEBI Master Circular"), the Board of Directors (the "Board") of the Company has formulated this policy on filing of claims by debenture holders for their unclaimed amounts transferred to Unpaid or Unclaimed Interest/Redemption Account or Investor Protection and Education Fund ("IPEF"). This policy acts as a guideline and specifies the procedure (including documentation) to be followed by debenture holders for claiming their unclaimed amounts.
Purpose	The purpose of this policy to facilitate procedure framework for dealing with unclaimed amounts lying with the Company and claims to be filed by the debenture holders for their unclaimed amounts transferred to the Unpaid or Unclaimed Interest Account or Investor Protection and Education Fund (IPEF), as the case may be. Considering that it could be possible that the interest amounts could remain unclaimed or unpaid because of various reasons, including failure to update account details by the debenture holders.
Definitions	**"Company"** means South City Projects (Kolkata) Private Limited (formerly known as South City Projects (Kolkata) Limited). **"IPEF"** means the Investor Protection and Education Fund constituted by the SEBI under the Securities and Exchange Board of India Act, 1992, as amended. **"SEBI Listing Regulations"** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, and the circulars, notifications, guidelines and clarifications issued thereunder, each as amended. **"Nodal Officer"** means the Compliance Officer of the Company**.**

	"Policy" means this policy, as amended from time to time in accordance with the provisions hereof**.** **"RTA"** means the Registrar and Transfer Agent of the Company**.** **"SEBI"** means the Securities and Exchange Board of India. **"Debenture Holder"** means any person who holds any debt securities issued by the Company. **"Unpaid or Unclaimed Interest/Redemption Account"** means the escrow account opened by the Company on behalf of the Company in any scheduled bank. **"Unpaid/ Unclaimed Amounts"** means any interest/ redemption amount which remains unclaimed by any Debenture Holder within the stipulated period. "**Debentures**" or "**NCDs**" shall mean debt securities as defined in SEBI Listing Regulations, as issued by the Company from time to time.
Nodal Officer	Compliance Officer of the Company has been appointed as the nodal officer as per this policy to handle all communication with investors, SEBI, stock exchange(s) and depositories. Further, the contact details of the Nodal Officer are available on the website of the Company at https://scpkl.aerogrid.in/ In case of change in nodal officer, the Company shall designate another person within 15 days of such change.
Transfer of Unpaid/Unclaimed Amounts	**A. Transfer of amounts to the Unpaid or Unclaimed Interest/Redemption Account:** a. Where the interest/ repayment amount to the Debenture Holders has not been claimed within thirty days from the due date of interest/ redemption payment (or such period as may be mandated by SEBI from time to time) the Company shall, within seven working days from the date of expiry of such 30-day period, transfer the Unpaid/Unclaimed Amounts to an Escrow Account to be opened by it on behalf of the Company in any scheduled bank Such account shall be termed as the 'Unpaid or Unclaimed Interest/Redemption Account'. b. In case a default is made in transferring the Unpaid/Unclaimed Amounts or portion thereof to the Unpaid or Unclaimed Interest/Redemption Account, the interest on the amount that has not been transferred to the Unpaid or Unclaimed Interest/Redemption Account, for the period of default, i.e., from the date of default until the date of transfer to the Unpaid or

Unclaimed Interest/Redemption Account, shall be payable at the rate of 12% per annum. Such interest amount shall accrue to the relevant Debenture Holder in proportion to the amount remaining unclaimed.

c. Within 30 days of transferring Unpaid/Unclaimed Amounts to the Unpaid or Unclaimed Interest/Redemption Account, the Company shall update the details of the "Unpaid/Unclaimed Amounts" on the website of the Company, with the details as per **Annexure A** or such other details as may be required under the SEBI Circular and other Applicable Law.

d. Any change in the information uploaded on the website of the Company shall be updated from time to time.

B. Transfer of amounts to the IPEF:

a. Transfer of unclaimed amount: Any Unpaid/Unclaimed Amounts transferred to the Unpaid or Unclaimed Interest/Redemption Account that remain unpaid or unclaimed for a period of seven years from the due date of such transfer, shall be transferred by the Company, 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 Company shall provide information about the Unpaid or Unclaimed Interest/Redemption 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.

b. Interest in case of default: In case a default is made in transferring the unclaimed amount or part thereof to the IPEF, the penalty of one lakh rupees and in case of continuing failure, a further penalty of five hundred rupees for each day that the failure continues, subject to a maximum of ten lakh rupees shall be payable.

c. Within 30 days of transferring the amounts to the IPEF, the Company shall update details of the transfer on the website of the Company as per **Annexure B** or such other details as may be required under the SEBI Circular and other Applicable Law.

d. Any change in the information uploaded on the website of the Company shall be updated from time to time.

C. Search Facility:

a. The Company shall provide a search facility on the website of the Company for Debenture Holders to verify if there is any unclaimed amount due to them in respect of the amount Lying in the Unpaid or Unclaimed Interest/Redemption Account of the Company or Transferred to the IPEF

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

i. PAN and Date of birth; or

ii. Name and Depository Participant Identification (DP ID)/ Client Identification (Client ID).

c. For information of unclaimed amounts, upon such search, the following information shall be visible to the debenture holder:

i. Amount due to the debenture holder on the date of declaration (in INR);

ii. Category - Interest/ Dividend/ Redemption Amount;

iii. Date when amount became due (dd/mm/yyyy);

iv. Amount (in INR) transferred to Unpaid or Unclaimed Interest/Redemption Account (including penal interest, if any, for delay in transfer by the Company);

v. Date when unclaimed amount was transferred to Unpaid or Unclaimed Interest/Redemption Account (dd/mm/yyyy);

vi. The interest, if any, in the Unpaid or Unclaimed Interest/Redemption Account, that accrues to the debenture holder in proportion to his/ her unclaimed amount, may also be disclosed by the Company.

d. Further, for information of the unclaimed amounts transferred to the IPEF, upon such search, the following information shall be visible to the debenture holder:

i. Amount lying unclaimed in the Unpaid or Unclaimed Interest / Redemption Account of the Company as at end of seven years (in INR);

ii. Break-up of interest/ dividend/ Redemption Amount;

iii. Date when amount became due for transfer to IPEF (dd/mm/yyyy);

iv. Amount (in INR) transferred to IPEF by the Company;

v. Date when unclaimed amount was transferred to the IPEF by the Company (dd/mm/yyyy);

Process and manner for claiming amounts	To ensure a standardised, smooth and hassle-free claim process for the unclaimed / unpaid amounts, the debenture holders shall follow the below process and provide the specified documents: **I. When Claimant(s) is the Registered Debenture Holder of the Company:** **a) Verification of unclaimed amounts:** The Debenture Holders shall verify if there is any unclaimed amount due to them and lying in the Unpaid or Unclaimed Interest/Redemption Account of the Company on the search facility on the website of the Company available at https://scpkl.aerogrid.in/. **b) Format for submission of claim and list of documents:** ➢ The Debenture holder(s) shall submit the claim for unpaid amounts in the format as prescribed in ***Annexure C.*** **c) Manner of submission of documents:** Debenture Holder(s) to approach the Nodal Officer of the Company or to the Registrar and Transfer Agent, Kfin Technologies Limited, by sending the aforementioned documents via e-mail as 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 or the records of the debenture holders are not adequately updated with the Registrar and Transfer Agent or Depositories, then Debenture Holder(s) shall provide additional information as sought, 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 Company. Further, failing to provide additional details sought within thirty (30) days, the claim will be rejected, and the debenture holder will be required to file a fresh claim. **e) Approval of Claims:** The Company shall within thirty (30) days of receipt of a claim application from a debenture holder and/ or receipt of complete information as called upon from the debenture holder and upon the complete verification of such application, remit the payment to the debenture holder using electronic modes for funds transfer.

f) Rejection of Claims:

On occurrence of the following circumstances, the Company will reject the claim:
a) if the claim has been previously processed or settled;
b) if the claim is unspecific or incorrect; or
c) if the records of the Debenture holder are not updated with the Registrar and Transfer Agent or Depository; or
d) if the Debenture holder fails to provide additional details within 30 days from the receipt of communication from the Company directing the Debenture holder 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 Debenture holder 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 format **Annexure C**;
- Documentary proofs as mentioned in **Annexure C.**
- Any other documents as required by the Nodal Officer/ Registered and Transfer Agents.

II. When Claimant(s) is the Legal Heir / Successor / Nominee of the Registered debenture holder of the Company:

a) In case of transmission of Debentures of the Company, whether the claimant is the Registered Debenture Holder or Legal Heir / Successor / Nominee of such Registered Debenture Holder of the Company, shall submit all the documents as required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, from time to time ("SEBI Listing Regulations") and circulars issued thereunder, as applicable.

b) The procedure as per the SEBI Listing Regulations for the transmission of debentures of Company and/ or the corresponding claim thereon is indicated in **Annexure D**.

III. Processing of claims in special circumstances:

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

Maintenance of Records	The Company shall preserve information pertaining to the Unpaid/Unclaimed Amounts of the Debenture holders, including relevant documentation. The Company shall furnish the necessary information, as and when called for by the SEBI.
Communication of this policy	This Policy shall be posted on the website of the Company i.e., https://scpkl.aerogrid.in/
Review of the policy	This Policy will be reviewed and reassessed by the Board of the Company 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.
Conflict with applicable law	The Policy shall not contradict with the provisions of any applicable laws. In case of any discrepancy, the provisions of applicable laws shall prevail over the provisions of this Policy.
Amendments	i. Any amendment or variation to this Policy shall be undertaken in compliance with the SEBI Company Regulations, SEBI Listing Regulations and other applicable laws/regulations. ii. Notwithstanding the above, this Policy will stand amended to the extent of any change in applicable law, including any amendment to the SEBI Company Regulations and the SEBI Listing Regulations, without any action from the Company or approval of the shareholders of the Company.

Annexure A

Amount lying unclaimed (in INR)	Category (Interest/ Redemption on amount/ any other)	Number of debenture holders	Date when amount became due (dd/mm/yyyy)	Date when the unclaimed amount was transferred to the Unpaid or Unclaimed Interest Account (dd/mm/yyyy)	Date when the amount is to be transferred to IPEF (dd/mm/yyyy)
Total:					

[1]**Including penal interest, if any**
Name and designation of Nodal Officer:
Email ID and phone number:

Annexure B

ISIN	Amount lying unclaimed in Unpaid or Unclaimed Interest Account as at end of seven years (in INR)	Category (Interest/ /Redemption on amount / any other)	Number of debenture holders	Date when amount became due for transfer to IPEF (dd/mm/yyyy)	Date when the unclaimed amount was transferred to the IPEF (dd/mm/yyyy)	Amount transferred to IPEF (in INR)
	Total:					

Name and designation of Nodal Officer:
Email ID and phone number:

Annexure C

Application for making claim for the Unclaimed/ Unpaid Amount

(To be furnished by the Debenture holder to the Company of Company along with supporting documents submit the claim for unpaid amounts)

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 Company:
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 / OCI / PIO Card no. (in case of NRI / Foreigners):
o. DP ID:
p. Client ID:

II. Particulars of Company / Company from which the amount is due:

a. Corporate Identification Number (CIN) of the Company:
b. Registration Number of the Company:
c. Registered office address of the Company:
d. E-mail address of the Company:

III. Account from which claim is being made:

a. Unpaid or Unclaimed Interest/Redemption Account
b. Investor Protection and Education Fund

IV. Details regarding Unpaid/Unclaimed Amounts:

a. Category- Interest/ Redemption/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:

V. 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:

VI. Any other relevant information:

VII. 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) Aadhar 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. 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. For claim of an amount up to INR 10,000/-, indemnity bond can be provided on a plain paper.

Annexure D

Procedure as per the SEBI Listing Regulations for the transmission of debentures of Company 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 SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 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:

i. duly signed transmission request ***form ISR-5*** by the nominee;

ii. self-attested copy of the PAN card of the nominee.

iii. any one of the following documents:

- 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;

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

i. ***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.

ii. duly signed transmission request form ISR-5 by the legal heir(s)/claimant(s);

iii. self-attested copy of the PAN card of the legal heir(s)/claimant(s);

iv. any one of the following documents:

- 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;

v. 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 gazetted 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 accompanies 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 accompanies 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 Company as on the date of submission of claim is upto 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:

a. 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

b. Notarized Indemnity Bond made on non-judicial stamp paper of Rs.500/-indemnifying the Company in the format specified by the SEBI.

Note: This format serves as an indication in accordance with the SEBI Listing Regulations, and it is subject to the amendments outlined in SEBI Listing Regulations and circulars issued thereunder. Additionally, upon submission, the Nodal Officer will review the format and ascertain whether further requirements are necessary.