



Policy on filing of claims by Unitholders and Debt security holders for unclaimed amounts

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POLICY ON FILING OF CLAIMS BY UNITHOLDERS AND DEBT SECURITY HOLDERS FOR UNCLAIMED AMOUNTS

A. INTRODUCTION

In terms of the Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014, as amended or supplemented, including any guidelines, circulars, notifications and clarifications framed or issued thereunder (“**SEBI InvIT Regulations**”), read with SEBI master circular bearing reference no. SEBI/HO/DDHS-PoD-2/P/CIR/2025/102 dated July 11, 2025 (“**SEBI Master Circular**”), and SEBI circular bearing SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 8, 2023 (“**SEBI Circular**”, together with SEBI Master Circular as “**SEBI Circulars**”, as the case may be) and Regulation 61A(2), 61A(3) and 61A(4) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the board of directors (the “**Board**”) of Sustainable Energy Infra Managers Private Limited (the “**Investment Manager**”), being the investment manager of the Sustainable Energy Infra Trust (the “**Trust**”) has formulated this policy on filing of claims by Unitholders (*as defined below*) and Debt Security Holders (*as defined below*) for their unclaimed amounts transferred to Unpaid Distribution Account or Unpaid Interest/Redemption Amount Account or Investor Protection and Education Fund (“**IPEF**”), as the case may be.

This policy on filing of Claims by Unitholders and Debt Security Holders for unclaimed amounts, as amended from time to time in accordance with the provisions hereof (“**Policy**”) aims to provide a comprehensive process to be followed by Unitholders and Debt Security Holders for claiming their unclaimed or unpaid amounts and processing of same by the Investment Manager. It stipulates the format in which claim shall be submitted by a Unitholder and Debt Security Holders, the procedure and documentation for making claim, the documents required to be submitted in support of the claim, manner and timeline of submission, conditions for rejection of claim, option of re-filing of a claim and the process to be followed for verification of claims.

B. APPLICABILITY

This Policy is implemented through the Investment Manager and shall be applicable to:

- (i) the Unitholders of the Trust having amounts unclaimed or unpaid out of the distributions declared by it; and
- (ii) the Debt Security Holders of the Trust having amounts unclaimed or unpaid out of the interest/ redemption declared by it.

C. DEFINITIONS

- a. “**Applicable Laws**” shall mean the laws having jurisdiction over the matter in question, including all applicable statutes, enactments, acts of legislature, ordinances, rules, bye-laws, regulations, notifications, decrees, arbitral awards, consents, directions, directives, orders or regulations or other governmental or regulatory restrictions or conditions, or any similar form of decision of, or determination by, any governmental authority, including SEBI (*as defined below*), whether in effect as of the date of this Policy or thereafter, including but not limited to the SEBI InvIT Regulations.
- b. “**Authorised Person**” means any person duly authorised by the Board.

- c. **“Board”** means the board of directors of the Investment Manager of Trust or any of the committees constituted by it.
- d. **“Debt Security Holder”** means any person who owns the non-convertible debt securities of the Trust.
- e. **“IPEF”** means the Investor Protection and Education Fund constituted by the SEBI under the Securities and Exchange Board of India Act, 1992, as amended.
- f. **“IPEF Regulations”** means Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009, as amended.
- g. **“Nodal Officer”** means company secretary of the Investment Manager, or any person as may be designated by the Board in accordance with Applicable Law.
- h. **“RTA”** means the Registrar and Unit Transfer Agent of the Trust.
- i. **“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.
- j. **“SEBI”** means the Securities and Exchange Board of India.
- k. **“Unclaimed Amount”** means such amount for which the payment to any Unitholder or Debt Security Holder has remained unpaid or unclaimed for the period specified under Applicable Law from the date of declaration of such amount. It is further clarified where the withholding tax has been previously deducted and deposited, such Unclaimed Amount shall be net of the withholding tax.
- l. **“Unitholders”** means any person who owns the Units of the Trust.
- m. **“Units”** means the beneficial interest in the Trust.
- n. **“Unpaid Distribution Account”** means a separate account opened/to be opened by the Investment Manager on behalf of the Trust in any scheduled bank for the purposes of holding Unclaimed Amounts payable to Unitholders.
- o. **“Unpaid Interest/Redemption Amount Account”** means an escrow account opened/to be opened by the Investment Manager on behalf of the Trust in any scheduled bank for the purposes of holding Unclaimed Amounts payable to Debt Security Holders.

D. NODAL OFFICER

The company secretary of the Investment Manager of the Trust has been appointed as the Nodal Officer to handle all communication with investors, SEBI, stock exchange(s) and depositories. The Nodal Officer is the point of contact for Unitholders and the Debt Security Holders entitled to claim their Unclaimed Amounts, in accordance with this policy.

Further, the contact details of the Nodal Officer are available on the website of the Trust at <https://www.seit.co.in/>. In case of any change in the Nodal Officer due to any reason, the Trust shall designate another person as a Nodal Officer within 15 (fifteen) days of such change.

E. TRANSFER OF UNCLAIMED AMOUNTS

- a. Where a distribution has been made by the Investment Manager within the timelines specified under the SEBI InvIT Regulations, but the payment to any Unitholders has remained unpaid or unclaimed, the Investment Manager shall, within seven working days from the date of expiry of timelines specified under the SEBI InvIT Regulations, transfer such Unclaimed Amount to the Unpaid Distribution Account. The details of such amount transferred to Unpaid Distribution Account shall be uploaded by the Investment Manager on the website of the Trust.
- b. Where the Investment Manager has paid the interest/dividend/repayment amount to the Debt Security Holders but some Debt Security Holders have not claimed interest/dividend/repayment amount within thirty days from the due date of such interest/dividend/ redemption payment, the Investment Manager shall within seven days from the date of expiry of the said period of thirty days transfer such Unclaimed Amount to the Unpaid Interest/Redemption Amount Account. The details of such amount transferred to the Unpaid Interest/Redemption Amount Account shall be uploaded by the Investment Manager on the website of the Trust.
- c. Any Unclaimed Amount transferred to the Unpaid Distribution Account or the Unpaid Interest/Redemption Amount Account pursuant to paragraphs (a) or (b) above, which remains unclaimed or unpaid for a period of seven years from the due date of such transfer, shall be transferred by the Investment Manager, along with interest accrued, if any, to IPEF within thirty days from the expiry of such seven-year period, in the manner prescribed under Applicable Law. Such fund transfer shall be made in the manner prescribed vide SEBI Circular ref. no. SEBI/HO/GSD/TAD/P/CIR/2023/149 dated September 4, 2023, as amended from time to time. The details of such transfer to IPEF shall be uploaded by the Investment Manager on the website of the Trust.
- d. In case a default is made in transferring the Unclaimed Amounts or portion thereof to the Unpaid Distribution Account or the Unpaid Interest/Redemption Amount Account, the Investment Manager shall pay interest on the amount that has not been transferred to the said account, for the period of default, *i.e.*, from the date of default until the date of transfer to the Unpaid Distribution Account or the Unpaid Interest/Redemption Amount Account, at the rate as may be prescribed by Applicable Law. Such interest amount shall accrue to the relevant Unitholder or Debt Security Holders 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 Trust.
- e. Within 30 (thirty) days of transferring Unclaimed Amount to the Unpaid Distribution Account or the Unpaid Interest/Redemption Amount Account, the Investment Manager shall upload the details of the information with respect to Unclaimed Amount on the website of the Trust, with the following details:

For Unitholders

Amount lying unclaimed* (in INR)	Category (Interest/ Dividend/ Repayment of	Number of Unitholders	Date when amount became due (dd/mm/yyyy)	Date when the amount was transferred to	Date when the amount is to be transferred to IPEF
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capital/other income/ any other)	the Unpaid Distribution Account (dd/mm/yyyy)
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**Including penal interest, if any*

Name and designation of Nodal Officer:

Email ID and phone number:

For Debt Security Holders

ISIN	Amount lying unclaimed* (in INR)	Category (Interest/ Dividend/ Redemption Amount)	Number of Debt Security Holders	Date when amount became due (dd/mm/yyyy)	Date when the unclaimed amount was transferred to the Unpaid Interest/Redemption Amount Account (dd/mm/yyyy)	Date when the amount is to be transferred to IPEF (dd/mm/yyyy)
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**Including penal interest, if any*

Name and designation of Nodal Officer:

Email ID and phone number:

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.

- f. 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 five hundred rupees for each day that the failure continues, subject to a maximum of ten lakh rupees. The Investment Manager shall not recover such penalty in the form of fees or any other form, payable to the Investment Manager by the Trust. Any penalty amount so transferred to the IPEF shall be utilised for the purposes described under Regulations 5(1) and 5(2) of the IPEF Regulations.
- g. The Investment Manager shall provide information about the Unclaimed Amount transferred to the IPEF, as per prescribed format in the SEBI Circulars, in hard copy, addressed to 'Chief General Manager, Office of Investor Assistance and Education, SEBI as well as in soft copy, via email to ipef@sebi.gov.in.
- h. In terms of Regulation 5(3)(ii) of the IPEF Regulations, an Investment Manager (on behalf of Trust), shall, after processing an application from a Unitholder or Debt Security Holder for Unclaimed Amount, make an application to IPEF for refund of such amount. The application has to be submitted by the Investment Manager for reimbursement of the amount transferred by it to the Unitholder or Debt Security Holder, as per prescribed format in SEBI Circulars, in hard copy, addressed to 'Chief General Manager, Office of Investor Assistance and Education, SEBI', as well as in soft copy, via email to ipef@sebi.gov.in.
- i. The Trust shall indemnify SEBI, against any future dispute that may arise with respect to the Unclaimed Amount of the Unitholder or Debt Security Holder, including, on account of a fraudulent claim or misrepresentation by the Unitholder or the Debt

Security Holder.

- j. Within 30 (thirty) 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, as given below:

Name of the Trust	Amount lying unclaimed in Unpaid Distribution Account as at end of seven years (in INR)	Category (Interest/ Dividend/ Repayment of capital/ any other)	Number of Unitholders	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)
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Name and designation of Nodal Officer:
Email ID and phone number:

For Debt Security Holders

ISIN	Amount lying unclaimed in Unpaid Interest/Redemption Amount Account as at end of seven years (in INR)	Category (Interest/ Dividend/ Redemption Amount)	Number of Debt Security 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)
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Name and designation of Nodal Officer:
Email ID and phone number:

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.

F. SEARCH FACILITY:

The Investment Manager shall provide a search facility on the website of the Trust for Unitholders and Debt Security Holders to verify if there is any Unclaimed Amount due to them and lying in the Unpaid Distribution Account or the Unpaid Interest/Redemption Amount Account.

Information of Unclaimed Amount:

- a. Upon search of amount lying in the Unpaid Distribution Account or the Unpaid Interest/Redemption Amount Account of the Trust, the following information shall be visible to the Unitholder or the Debt Security Holder, as the case may be:
- Amount due to the Unitholder or Debt Security Holder on the date of declaration/ payment (in INR);
 - Category – interest/ dividend/ redemption amount;

- Date when amount became due (dd/mm/yyyy);
 - Amount (in INR) transferred to the Unpaid Distribution Account or the Unpaid Interest/Redemption Amount Account (including penal interest, if any, for delay in transfer by the Investment Manager);
 - Date when Unclaimed Amount was transferred to the Unpaid Distribution Account or the Unpaid Interest/Redemption Amount Account (dd/mm/yyyy);
 - The interest, if any, in the Unpaid Distribution Account or the Unpaid Interest/Redemption Amount Account, that accrues to the Unitholder or the Debt Security Holders in proportion to his/ her unclaimed amount, may also be disclosed by the Investment Manager.
- b. Upon search of amount transferred to the IPEF, the following information shall be visible:
- Amount lying Unclaimed Amount in the Unpaid Distribution Account or the Unpaid Interest/Redemption Amount Account of the Trust as at end of seven years (in INR);
 - Break-up of interest/ dividend/ repayment of capital/ any other;
 - Date when amount became due for transfer to IPEF (dd/mm/yyyy);
 - Amount (in INR) transferred to IPEF by the Investment Manager;
 - Date when Unclaimed Amount was transferred to the IPEF by the Investment Manager (dd/mm/yyyy).

G. PROCESS AND MANNER FOR CLAIMING AMOUNTS

- a. Unitholders or Debt Security Holders entitled to any Unclaimed Amount transferred to the Unpaid Distribution Account, the Unpaid Interest/Redemption Amount Account, or IPEF, as the case may be, may claim such amount by submitting an application to the Investment Manager in the manner set out in this Policy. Upon processing the application and satisfying itself of the correctness of the information submitted, the Investment Manager shall remit the payment to the Unitholder or Debt Security Holder using electronic modes of funds transfer. Where the Unclaimed Amount has been transferred to IPEF, the Investment Manager shall thereafter make an application to IPEF for refund of such amount in the manner prescribed under Applicable Law.
- b. To ensure a standardized, smooth and hassle-free claim process for the Unclaimed Amount, the Unitholders and Debt Security Holders shall follow the process below and provide the specified documents:
- (i) **Verification of Unclaimed Amounts:**

The Unitholders and Debt Security Holders shall verify if there is any Unclaimed Amount due to them and lying in the Unpaid Distribution Account, the Unpaid Interest/Redemption Amount Account of the Trust or the IPEF on the search facility on the website of the Trust available at <https://www.seit.co.in> .

(ii). **Format for submission of claim and list of documents:**

The Unitholder(s) and Debt Security Holder(s) shall submit the application in the format provided as **Annexure A** as applicable. The claim shall be submitted either by the Unitholders/ Debt Security Holders themselves or by their legal heir/ nominee.

(iii). **Manner of submission of documents:**

Unitholders(s) and Debt Security Holder(s) may submit their claims by sending an email to following email IDs:

- a) to the Investment Manager, at compliance@seit.co.in ; or
- b) to the RTA, at seit.invit@kfintech.com .

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

- Claim form;
- Documentary proofs as mentioned in **Annexure A**; and
- Any other documents as required by the Nodal Officer/ Registered and Transfer Agents

In case of transmission of Units or debt securities of the Trust, whether the claimant is the legal heir / successor / nominee of the Unitholder or Debt Security Holder, such person shall submit all the documents as required under SEBI Listing Regulations and circulars issued thereunder, for the transmission of Units of Trust and/ or the corresponding claim thereon, as applicable.

(iv). **Furnishing of information for defects or incompleteness:**

The Investment Manager shall intimate the Unitholder or Debt Security Holder by e-mail or other written communication in case of any further information is required or if any defects or incompleteness is found in the documents upon examination. The Investment Manager shall direct the Unitholder(s) or Debt Security Holder(s) 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 Investment Manager.

Further, failing to provide additional details sought within thirty (30) days, the claim will be rejected. However, rejection of claim does not debar a Unitholder or the Debt Security Holder from filing a fresh claim.

(v). **Approval of Claims:**

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

Further, in case of any queries or grievances, relating to the claim the Unitholder or Debt Security Holders can e-mail on compliance@seit.co.in and contact at Tel: [+91 22 6209 7900](tel:+912262097900).

(vi). **Rejection of Claims:**

On the occurrence of the following circumstances, the Investment Manager 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 Unitholder or Debt Security Holders fails to provide additional details within 30 days from the receipt of communication from the Investment Manager directing the Unitholder or the Debt Security Holder to furnish such information or to rectify such defects or incompleteness or to re-submit such application or documents.

The Nodal Officer or concerned department may reject the claim by citing the reasons for rejection, in writing (through email or physical letter) to the claimant. However, rejection of the claim does not prevent the Unitholder or the Debt Security Holder from filing a fresh claim.

Further, in case of any queries or grievances, relating to the claim the Unitholder or Debt Security Holder can e-mail on compliance@seit.co.in.

Processing of refund claim of the Trust from IPEF:

a) **Processing of refund application:** Upon receipt of a refund application from the Trust, SEBI shall:

- (i) verify the documentation and satisfy itself of the correctness of information submitted and process refund of the amount paid by the Trust to the Unitholder or Debt Security Holder. The refund amount shall not exceed the amount transferred by the Trust against such Unitholder or Debt Security Holder in IPEF;
- (ii) require the Trust, to furnish further information or clarifications, regarding the unclaimed amount and matters connected thereto, to consider the application for refund. The applicant shall, if so required, provide the necessary information/ clarifications;
- (iii) return the application, if it is found to be incorrect, incomplete or inadequate, along with reasons thereof. The Trust may re-submit the application for re-consideration after rectifying the deficiencies.

b) **Processing of claims in special circumstances:**

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

H. MAINTENANCE OF RECORDS

The Investment Manager (on behalf of the Trust) shall preserve information pertaining to the Unclaimed Amounts of the Unitholders and Debt Security Holders, including relevant documentation for such period as prescribed under the SEBI InvIT Regulations. The Investment Manager (on behalf of the Trust) shall furnish the necessary information, as and when called for by the SEBI.

The Investment Manager shall display the cumulative details of the number of claims received, processed, pending, etc. on the website of the Trust.

I. COMMUNICATION OF THIS POLICY

This Policy shall be posted on the website of the Trust i.e. <https://www.seit.co.in> .

J. REVIEW OF THE POLICY

This Policy will be reviewed and reassessed by the Board 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.

K. 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.

L. AMENDMENT

- i. Any amendment or variation to this Policy shall be approved by the Board of the Investment Manager and undertaken in compliance with the SEBI InvIT 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 InvIT Regulations and the SEBI Listing Regulations, without any action from the Investment Manager or approval of the unitholders of the Trust.

Adopted by the board of directors of Sustainable Energy Infra Investment Managers Private Limited on behalf of the InvIT on March 15, 2026.

Annexure A

Application for making claim for the Unclaimed Amount

(To be furnished by the Unitholder or Debt Security Holder to the Investment Manager of Trust along with supporting documents to submit the claim for unpaid amounts)

I hereby confirm that I have not received the [distribution/interest/repayment amount] for the [●] quarter(s) of financial year(s) [●]. I have also verified the same from the details published on the website of the Trust. I am providing the below mentioned information and enclosing the scanned copies of the documents required to enable you to do the needful:

OR

[I hereby confirm that I, (*Name*), the Claimant, am the legal heir/nominee of (*Name of Investor & DP ID*), the Unitholder/ Debt Security Holder. I further confirm that we have not received the [distribution/interest/repayment amount] for the [●] quarter(s)/period of financial year(s) [●]. I have also verified the same from the details published on the website of the Trust. I am providing the below mentioned information and enclosing the scanned copies of the documents required to enable you to do the needful:] [*Note: To be included in the application made by the nominees/ successors*]

I. Details of the Applicant:

- a. Category of the applicant:
- 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 Trust:
- 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. Details of Unitholder/ Debt Security Holder (if different from the details of the Applicant)

- a. Name of the Unitholder/ Debt Security Holder:
- b. Category:
- c. DP ID:
- d. Client ID:
- e. PAN Number:

III. Account from which claim is being made:

- a. Unpaid Distribution Account/ Unpaid Interest/Redemption Amount Account

- b. Investor Protection and Education Fund

IV. Details regarding Unclaimed Amounts:

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

V. Bank details for initiating direct credit of 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.

Name:

Signature

Date:

Place:

Please submit the following documents with this application:

1. Original demand draft, in case the original payment was paid by the Trust through DD;
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 jointholders.
 - 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; or
 - 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. Registered Unitholder or Debt Security Holder;
6. Proof of succession, nomination, transmission of Units or Debt Securities, as applicable;
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. For claim of an amount up to INR 10,000/-, indemnity bond can be provided on plain paper.