

**TATA STEEL**



**Policy on claiming unclaimed amounts on  
non-convertible securities**

**Approved on March 20, 2024**



## 1. Background

Tata Steel Limited (**'Company'**), from time-to-time, issues rated, redeemable, non-convertible debentures (**'NCDs'**) which are listed on the debt market segment of BSE Limited(**'BSE'**)/National Stock Exchange of India Limited (**'NSE'**).

Regulation 61A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 (**'SEBI Listing Regulations'**), as amended, provides that, where any interest/dividend/redemption amount on non-convertible securities has not been claimed by the eligible investor within 30 days from the due date of such payment, a listed entity shall within 7 days from expiry of the said period of 30 days, transfer the amount to an escrow account to be opened by the listed entity with any scheduled bank. Further, any aforementioned amount that remains unclaimed in the escrow account for more than 7 years shall be transferred to the Investor Education and Protection Fund (**'IEPF'**) constituted in terms of the provisions of the Companies Act, 2013 (**'Act'**).

SEBI vide its circular no. SEBI/HO/DDHS-RAC-1/P/CIR/2023/176 dated November 8, 2023 (**'SEBI Circular'**), has laid down procedural framework for dealing in unclaimed amounts lying with listed entities having listed non-convertible securities and manner for claiming such amounts by investors. In terms of the SEBI Circular, listed entity having issued non-convertible securities are required to designate a person as a 'Nodal Officer' who shall be the point of contact for investors entitled to claim their unclaimed amounts on non-convertible securities of the listed entity as well as provide clarification to queries as raised by SEBI / Depositories / stock exchanges from time to time. The SEBI Circular further requires the listed entity to formulate a policy specifying the process to be followed by investors for claiming their unclaimed amounts.

The Company had in the past issued NCDs which were listed on the debt market segment of BSE and NSE and which have been redeemed by the Company on their due dates. For these redeemed NCDs, certain unclaimed amounts are lying with the Company in its escrow account maintained with a scheduled bank. Such unclaimed amounts will be transferred to IEPF Account after completion of 7 years from the date when they were transferred to the scheduled bank account.

Given the above background, the Policy on claiming unclaimed amounts lying with the Company (**'Policy'**) is being framed and implemented.

## 2. Applicability

The Policy shall be effective March 1, 2024.

## 3. Scope

The Policy covers:

- the format in which claim has to be submitted by the investor
- the procedure and documentation for making claim or to be submitted in support of the claim
- manner of submission of claim by the investor and related timelines
- conditions for rejection of claim and option of re-filing of a claim by the investor

- timeline within which the claim shall be processed by the listed entity

In this Policy, unless the context requires otherwise:

- a. 'Listed entity'/ 'the Company' shall mean Tata Steel Limited
- b. 'Board of Directors' shall mean the Board of Directors of Tata Steel Limited.
- c. 'Nodal Officer' shall mean a person so designated by the Board of Directors from amongst the Directors or Chief Financial Officer or Company Secretary or Compliance Officer of Tata Steel Limited
- d. 'Key Managerial Personnel' means Managing Director, Chief Financial Officer and Company Secretary of Tata Steel Limited.

All other words and expressions used but not defined in this Policy, but defined in the SEBI Act, 1992, SEBI Listing Regulations, Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996, as amended, and/or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such Acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

#### **4. Format, Procedure and Documentation for claim submissions**

Any investor claiming to be entitled to any unclaimed amount lying with the listed entity may apply to the Registrar and Transfer Agent ('RTA') of the listed entity for payment of such amount, in the manner as provided below:

- a) Submit the following documents
  - Request letter duly signed by all beneficiary holders
  - Self-Attested Copy of Client Master List
  - Self-Attested Copy of Pan Card for all beneficiary holders
  - Self-Attested Copy of Address Proof
  - Original Cancelled cheque
- b) Upon verification of the abovementioned documents, the RTA may request for additional information/documents as may be required for further verification.

**Note:** The aforementioned provisions in respect of the investor, shall apply, *mutatis mutandis*, to the legal heir/ successor/ nominee of the investor. The legal heir/ successor/ nominee shall satisfy the provisions specified under the SEBI Listing Regulations and circulars issued thereunder, for the transmission of non-convertible securities and/ or the corresponding claim thereon, as applicable.

#### **5. Manner of submission of claim by the investor and related timelines**

The investor shall e-mail the claim form along with requisite documents to the listed company at [cosec@tatasteel.com](mailto:cosec@tatasteel.com) with a copy to the RTA at [csg-unit@tcplindia.co.in](mailto:csg-unit@tcplindia.co.in)

The physical copy of the above documents shall be send to RTA at:

Link Intime India Private Limited  
Unit: Tata Steel Limited  
C-101, 1st Floor, 247, Park  
L.B.S. Marg, Vikhroli (West)  
Mumbai – 400 083  
Tel: +91-22-66568484  
Fax: +91-22-66568494

Upon receipt of claim application, if the RTA/Company, 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, of such need for information or defects or incompleteness, by e-mail or other written communication.

The Company shall within thirty (30) days of receipt of a claim application from an investor or complete information as called upon from the investor, remit the payment to the investor using electronic modes of funds transfer.

The Company shall display the cumulative details of the number of claims received, processed, pending, etc. on its website.

## **6. Conditions for rejection of claim and option of re-filing of a claim by the investor**

The listed entity shall direct the investor to furnish such information or to rectify such defects or incompleteness or to re-submit such application or document(s) within thirty (30) 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 from filing a fresh claim.

## **7. Website**

- The Company shall make the provisions of the SEBI Circular available on its website.
- The Company shall display information of unclaimed amounts on NCDs on its website with necessary details as specified in the SEBI Circular.
- The Company shall provide a search facility on its website for investors to verify if there is any unclaimed amount due to them and lying in the Escrow Account of the listed entity. The facility can be a combination of PAN details and date of birth or, Name and DP ID-Client ID.
- The Company shall display the cumulative details of the number of claims received, processed, pending, etc. on its website.
- Details of 'Nodal Officer' shall be made available on the website. Pursuant to the SEBI Circular and as approved by the Board at its meeting held on January 24, 2024, Mr. Parvatheesam Kanchinadham, Company Secretary and Chief Legal Officer (Corporate & Compliance), has been appointed as the 'Nodal Officer' for the purposes as mentioned in the SEBI Circular.

*Any change in the information uploaded on the website shall be updated by the listed entity by the seventh day of the succeeding month.*

## **8. Maintenance of records**

The listed entity shall preserve information pertaining to the unclaimed amounts of investors including relevant documentation. The listed entity shall furnish necessary information, as and when called for by any Regulatory Authority

## **9. Policy Review**

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The Board of Directors may review the Policy from time to time.

Should there be any inconsistency between the terms of the Policy and the SEBI Listing Regulations or the Act or SEBI Circular or any other provision of applicable laws, as amended from time to time, the provisions of the applicable law shall prevail.

Any amendments to the SEBI Listing Regulations, SEBI Circular, Act, applicable laws shall *mutatis mutandis* be deemed to have been incorporated in this Policy.

## **10. Contact**

Questions or clarifications about the Policy should be referred to the Company Secretary and Chief Legal Officer (Corporate & Compliance), who is in charge of administering, enforcing and updating this policy.

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