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Adopted by the Board of Investment Manager on:	August 13, 2025
Amended by the Board of Investment Manager on:	NA

POLICY FOR PROCESSING AND CLAIMING THE UNCLAIMED DISTRIBUTION AMOUNT

A. PREAMBLE

In terms of the Securities and Exchange Board of India (Infrastructure Investment Trusts) Regulations, 2014, including any amendment thereof ("**InvIT Regulations**"), read with SEBI Master Circular for InvITs dated July 11, 2025 bearing reference no SEBI/HO/DDHS-PoD-2/P/CIR/2025/102, ("**SEBI Master Circular**"), the board of directors (the "**Board**") of Vertis Fund Advisors Private Limited (*formerly known as Highway Concessions One Private Limited*) ("**Investment Manager**" or "**IM**"), Investment Manager of Vertis Infrastructure Trust (*formerly known as Highways Infrastructure Trust*) ("**Trust**") has formulated this policy on filing of claims by unitholders for their unclaimed distribution amounts transferred to Unpaid Distribution Account or Investor Protection and Education Fund ("**IPEF**"). This policy acts as a guideline and specifies the procedure (including documentation) to be followed by unitholders for claiming their unclaimed or unpaid distribution amounts.

B. APPLICABILITY

This Policy applies to the unitholders of the Trust who have unclaimed or unpaid amounts arising from distributions declared by the Trust and shall be implemented by the Investment Manager.

C. OBJECTIVE OF THE POLICY

The purpose of this policy is to facilitate the procedural framework for dealing with unclaimed distribution amounts lying with the Trust and claims to be filed by the unitholders for their unclaimed distribution amounts transferred to the Unpaid Distribution Account or Investor Protection and Education Fund, as the case may be.

Given the possibility that distribution amounts may remain unclaimed or unpaid due to various reasons — including, but not limited to, unitholders not updating their bank account details or providing accurate payment information, this policy seeks to ensure a transparent, consistent, and regulatory-compliant mechanism for addressing such instances.

D. DEFINITIONS:

1. "**Board**" means the board of directors of the Investment Manager of the Trust or any of the Committees constituted by it.
2. "**Investment Manager**" means Vertis Fund Advisors Private Limited (*formerly known as Highway Concessions One Private Limited*).
3. "**InvIT Regulations**" means the Securities and Exchange Board of India (Infrastructure Investment Trust) Regulations, 2014 as amended from time to time including any circular, notifications issued thereunder.
4. "**Nodal Officer**" means the Compliance Officer of the Trust.
5. "**Trust or InvIT**" means Vertis Infrastructure Trust (*formerly known as Highways Infrastructure Trust*).
6. "**IPEF**" means the Investor Protection and Education Fund constituted by the Securities and Exchange Board of India ("**SEBI**") under the Securities and Exchange Board of India Act, 1992, as amended.
7. "**Units**" shall mean units issued by the Trust.

8. **“Unitholders”** means any person who owns the units of the Trust.
9. **“Unpaid Distribution Account”** means the escrow account opened by the Investment Manager on behalf of the Trust in any scheduled bank.
10. **“Unpaid/ Unclaimed Amounts”** means such distribution amounts for which the payment to any Unitholder has remained unpaid or unclaimed.

E. INTERPRETATION

- (a) Capitalised terms used, but not defined herein, shall have the meaning ascribed to such term under the InvIT Regulations and related circulars issued by SEBI.
- (b) In case of any inconsistency between the terms of the InvIT Regulations and this Policy, the terms of the InvIT Regulations shall prevail.

F. NODAL OFFICER

Compliance Officer of the Trust has been appointed as the nodal officer to handle all communication with Unitholders, Securities and Exchange Board of India (**“SEBI”**), National Stock Exchange of India (**“NSE”**) and Depositories.

Further, the contact details of the Nodal Officer are available on the website of the Trust at <https://highwaystrust.com/>

G. TRANSFER OF UNPAID/UNCLAIMED DISTRIBUTION AMOUNTS

- i. Where the Investment Manager has made distribution within the timelines specified under Regulation 18(6)(c) of the 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 Regulation 18(6)(c) of the InvIT Regulations (as amended from time to time), transfer such unclaimed or unpaid amount to an Escrow Account to be opened by it on behalf of the Trust in any scheduled bank to be termed as ‘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.
- ii. Any amount transferred to the Unpaid Distribution Account as mentioned in points (i) above, which remains 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, if any, thereon, to the IPEF within a period of thirty days from the date of expiry of seven years. The details of such amount transferred to IPEF shall be uploaded by the Investment Manager on the website of the Trust.
- iii. Unitholders entitled to any unclaimed/unpaid distribution amount transferred to Unpaid Distribution Account/IPEF Account, can claim the same by making application to Investment Manager in the manner as mentioned in this Policy.

H. PROCESS FOR FILING OF CLAIMS:

To ensure a standardised, smooth and hassle-free claim process for the unclaimed / unpaid distribution amounts, the unitholders shall follow the below process and provide the specified documents.

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

a) Verification of unclaimed amounts:

The unitholders shall verify whether any unclaimed/unpaid distribution amount due to them is lying in the Unpaid Distribution Account of the Trust by using the search facility available on the Trust's website.

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

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

c) Manner of submission of documents:

Unitholders may submit their claims by sending an email either to the Nodal Officer of the Trust at compliance.highwaysinvit@vertis.co.in or to the Registrar and Transfer Agent ("RTA"), MUFG Intime India Private Limited, at rnt.helpdesk@in.mpms.mufg.com.

d) Furnishing of information for defects or incompleteness:

In case any further information is required or if any defects or deficiencies are found in the submitted documents upon examination, the unitholder shall provide the necessary information, rectify the issues, or re-submit the application/documents within thirty (30) days from the date of receipt of such communication from the Trust.

Failure to do so within the prescribed period will result in rejection of the claim, and the unitholder will be required to submit a fresh claim.

e) Approval of Claims:

The Investment Manager shall, within thirty (30) days from the later of (a) receipt of a claim application from a unitholder; and (b) receipt of all requisite information sought from the unitholder, and upon complete verification of such application, remit the payment to the unitholder through electronic modes of funds transfer.

f) Processing of refund claim from IPEF

In case the unclaimed amount has been transferred to the IPEF Account, the Investment Manager shall, upon processing the unitholder's application for such unclaimed distribution amount, submit an application to the IPEF for refund of the amount in the manner prescribed under the InvIT Regulations."

g) Rejection of Claims:

On the occurrence of the following circumstances, the Investment Manager will reject the claim:

- i. if the claim has been previously processed or settled;
- ii. if the claim is unspecific or incorrect; or
- iii. If the Unitholder fails to provide the additional details within thirty (30) days from the date of receipt of communication from the Investment Manager directing the Unitholder to furnish such information, rectify the defects or incompleteness, or re-submit the application or documents.

However, rejection of the claim does not prevent the Unitholder from filing a fresh claim.

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

The provisions in respect of the claim by unitholder, shall apply, mutatis mutandis, to the claim by legal heir/ successor/ nominee of the unitholder. The legal heir/ successor/ nominee shall satisfy the provisions specified under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and other applicable laws for the transmission of Units and/or the corresponding claim thereon, as applicable. They are required to furnish to the Investment Manager/ RTA, the duly executed form and relevant details along with the supporting documents as mentioned in **Annexure B**.

I. 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 distribution Amounts.

J. DISPLAY OF INFORMATION W.R.T. CLAIMS ON WEBSITE:

The Investment Manager shall:

1. within a period of thirty days of transferring the unclaimed or unpaid distribution amount to the Unpaid Distribution Account, upload the below mentioned details on the website of Trust:

Amount lying unclaimed (including penal interest, if any) (in INR)	Category (Interest/ Dividend/ Repayment of Capital/ Any other)	No. of Unitholders	Date when amount became due (dd/mm/yy yy)	Date when unclaimed amount was transferred to Unpaid Distribution Account (dd/mm/yyyy)	Date when amount is to be transferred to IPEF (dd/mm/yyyy)
Total					

Name and designation of the Nodal Officer:
Email ID and phone no.:

2. provide a search facility on the website of the Trust for Unitholders to verify if there is any unclaimed or unpaid distribution amount due to them and lying in the Unpaid Distribution Account of the Trust.
3. display the cumulative details of the number of claims received, processed, pending, etc. on the website of the Trust.
4. within a period of thirty days of transferring the unclaimed or unpaid amounts to the IPEF, upload the details on the website of the Trust, as given below:

Name of InvIT	Amount lying unclaimed in Unpaid Distribution Account as at end of seven years (in INR)	Category (Interest/ Dividend/ Repayment of Capital/ Any other)	No. of Unitholders	Date when amount became due for transfer to IPEF (dd/mm/yyyy)	Date when unclaimed amount was transferred to IPEF (dd/mm/yyyy)	Amount transferred to IPEF (in INR)
Total						

Name and designation of the Nodal Officer:

Email ID and phone no.:

5. 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.

K. MAINTENANCE OF RECORDS:

The Investment Manager, on behalf of the Trust, shall preserve information pertaining to the unclaimed or unpaid distribution amounts of the Unitholders including relevant documentation. The Investment Manager shall furnish necessary information, as and when called for by SEBI.

L. CONTACT DETAILS WHEREIN UNITHOLDER CAN RAISE THEIR QUERIES OR GRIEVANCES, IF ANY, RELATING TO THEIR CLAIM

Contact Person: Nodal Officer

Email Id: compliance.highwaysinvit@vertis.co.in

Phone no.: 022 – 61073200

RTA: MUFG Intime India Private Limited (Unit: Vertis Infrastructure Trust)

Email Id: rnt.helpdesk@in.mpms.mufg.com

Phone No.: 022 – 4918 6000

M. AMENDMENT

Any amendment or variation to this Policy shall be undertaken in compliance with the InvIT Regulations and other applicable laws/regulations by the Board of Investment Manager upon recommendation of Stakeholders Relationship Committee.

Notwithstanding the above, this Policy will stand amended to the extent of any change in applicable law, including any amendment to the InvIT Regulations or circulars issued thereunder, without any action from the Investment Manager or approval of the Unitholders of the Trust.

N. COMMUNICATION OF THIS POLICY

This Policy shall be posted on the website of the Trust i.e. <https://highwaystrust.com/> or any other new website as is updated from time to time.

Adopted by the board of directors of Vertis Fund Advisors Private Limited (formerly known as Highway Concessions One Private Limited) on August 13, 2025.

Annexure- A

(To be furnished by the unitholder to the Investment Manager /RTA along with supporting documents for claim of unpaid/unclaimed distribution amounts)

Format of Application for Claiming Unclaimed Distribution Amount

To,

The Nodal Officer

Vertis Infrastructure Trust

(formerly known as Highways Infrastructure Trust)

Unit No. 601-602, 6th Floor, Windsor House, Off CST Road,

Kalina, Santacruz East, Mumbai 400 098, Maharashtra

Subject: Request for Payment of Unclaimed Distribution

Dear Sir/Ma'am,

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

1.	Name of the Unitholder	
2.	DP ID	
3.	Client ID	
4.	Unclaimed Amount	
5.	PAN	
6.	Mobile Number	
7.	Email ID	
8.	Account from which claim is being made (Unpaid Distribution Account or Investor Protection and Education Fund)	
9.	Details of the bank account with Unitholder Name, Account number and IFSC code where the unpaid dividend distribution amount shall be credited through electronic mode.	

Declaration

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

Signature of the Unitholder

Mandatory Enclosures:

1. Self-attested copy of DEMAT account statement as a proof of unitholding
2. Self-attested Client Master List (CML) with updated bank details
3. Self-attested copy of PAN card of the of the claimant and if there are joint holders, of all joint holders.
4. Self-attested copy 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.
5. Self-attested copy of Passport, OCI, PIO, duly apostilled as per the laws of their country, in case of foreigners and NRI and the proof of residence.
6. Cancelled cheque leaf of the Bank Account

Note: 1. Additional documents may be sought by the Nodal Officer on case-to-case examination.



Annexure- B
(For Unitholders)

Format of Application for Claiming Unclaimed Distribution Amount by Legal Heir or Nominees

To,
The Nodal Officer
Vertis Infrastructure Trust
(formerly known as Highways Infrastructure Trust)
Unit No. 601-602, 6th Floor, Windsor House, Off CST Road,
Kalina, Santacruz East, Mumbai 400 098, Maharashtra

Subject: Request for Payment of Unclaimed Distribution

Dear Sir/Ma'am,

I hereby confirm that I, *(Name)*, the Claimant am the legal heir/nominee of *(Name of Investor & DP ID, Client ID)*, the Unitholder. I further confirm that we have not received the distribution for the [●] quarter(s) of financial year(s) [●]. I have also verified the same from the Unpaid Distribution amount details published on the website of the Trust. I am providing the above-mentioned information and enclosing the scanned copies of the documents required to enable you to do the needful:

1.	Name of the Unitholder	
2.	DP ID & Client ID of the Unitholder	
3.	Name of the Claimant	
4.	DP ID & Client ID of the Claimant	
5.	Unclaimed Amount	
6.	PAN number (Claimant & Unitholder)	
7.	Mobile Number of the Claimant	
8.	Email ID of the Claimant	
9.	Account from which claim is being made (Unpaid Distribution Account or Investor Protection and Education Fund)	
10.	Details of the bank account with Claimant Name, Account number and IFSC code where the unpaid distribution amount shall be credited through electronic mode.	

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 of the Claimant

Mandatory Enclosures:

1. Self-attested copy of DEMAT account statement as a proof of unitholding
2. Self-attested Client Master List (CML) with updated bank details
3. Self-attested copy of PAN card of the of the claimant and if there are joint holders, of all joint holders.
4. Self-attested copy 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.
5. Self-attested copy of Passport, OCI, PIO, duly apostilled as per the laws of their country, in case of foreigners and NRI and the proof of residence.
6. Cancelled cheque leaf of the Bank Account

In addition to the above, the following documents needs to be provided by the legal heir / successor / nominee of the Unitholders:

- (a) original death certificate of the unitholder 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) self-attested copy of the PAN card of the legal heir(s)/claimant(s);
- (c) copy of Succession Certificate/ Legal Heir Certificate/ Will/ Probate of Will or letter of administration etc., attested by the claimant, subject to verification with the original or duly attested by a notary public or by a gazetted officer.
- (d) 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), in the format specified by the SEBI and 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.

Note: 1. Additional documents may be sought by the Nodal Officer on case-to-case examination.