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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 INTEREST/REDEMPTION AMOUNT WITH RESPECT TO LISTED NON-CONVERTIBLE SECURITIES

A. PREAMBLE

Regulation 61A (2) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**LODR Regulations**"), provides that where the interest/ dividend/ redemption amount has not been claimed within thirty days from the due date of interest/ dividend/ redemption payment, a listed entity shall within seven days from the date of expiry of the said period of thirty days, transfer the amount to an Escrow Account.

Further, SEBI vide circular no. SEBI/HO/DDHS/DDHS-RAC-1/P/CIR/2023/176 dated November 08, 2023, has laid down a standardized framework for dealing with unclaimed amounts and also mandates that a policy, specifying the process to be followed by investors for claiming respective unclaimed amounts, shall be formulated by all listed entities.

Accordingly, 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 a policy on filing of claims by securityholders for their unclaimed amounts transferred to Escrow Account or Investor Protection and Education Fund ("**IPEF**"). This policy acts as a guideline and specifies the procedure (including documentation) to be followed by securityholders for claiming their interest/ dividend/ redemption amount.

B. APPLICABILITY

This Policy applies to the securityholders of the Trust who have unclaimed amounts arising from payment of interest/redemption amount 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 amounts lying with the Trust and claims to be filed by the securityholders for their unclaimed interest/redemption amounts transferred to the Escrow Account or Investor Protection and Education Fund, as the case may be.

Given the possibility that unclaimed interest/redemption amounts may remain unclaimed or unpaid due to various reasons — including, but not limited to, securityholders 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. "**Disclosure Document(s)**" refers to the Information Memorandum / Prospectus / General Information Document / Key Information Document / Placement Memorandum / Term sheet or any other document by whatever name called containing the terms and conditions in relation to the issuance of non-convertible securities/commercial papers
3. "**Investment Manager**" means Vertis Fund Advisors Private Limited (*formerly known as Highway Concessions One Private Limited*).

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. **“Non-Convertible Securities or Securities”** shall mean debentures and commercial papers issued by the Trust.
8. **“Security Holder(s)”** shall mean the person holding debentures or commercial paper issued by the InvIT.
9. **“Unclaimed Amounts”** interest and/or redemption amount on debentures/commercial papers issued by the Trust, which has remained unclaimed or unpaid for 30 days from the due date of interest / redemption payment.

E. INTERPRETATION

- a) Capitalised terms used, but not defined herein, shall have the meaning ascribed to such term under the LODR 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 LODR Regulations shall prevail.

F. NODAL OFFICER

Compliance Officer of the Trust has been appointed as the nodal officer to handle all communication with Security holders, 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 INTEREST/DEBENTURE REDEMPTION AMOUNTS

- i. Where the Investment Manager has made payment of interest/redemption amount within the timelines specified under disclosure documents but the payment to any securityholder has remained unpaid or unclaimed, the Investment Manager shall, within seven working days from the date of expiry of 30 days from the due date, transfer such unclaimed interest/redemption amount to an Escrow Account to be opened by it on behalf of the Trust in any scheduled bank. The details of such amount transferred to Escrow Account shall be uploaded by the Investment Manager on the website of the Trust.
- ii. Any amount transferred to the Escrow Account as mentioned in points (i) above, which remains 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. Securityholders entitled to any unclaimed/unpaid interest/redemption amount transferred to Escrow 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 interest/redemption amounts, the securityholders shall follow the below process and provide the specified documents.

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

a) Verification of unclaimed amounts:

The securityholder shall verify whether any unclaimed/unpaid amount due to them is lying in the Escrow 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 securityholder(s) shall submit the claim for unclaimed amounts in the format as prescribed in Annexure A.

c) Manner of submission of documents:

Securityholders 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 securityholder 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 Securityholder 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 Securityholder; and (b) receipt of all requisite information sought from the Securityholder, and upon complete verification of such application, remit the payment to the Securityholder 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 Securityholder application for such unclaimed amount, submit an application to the IPEF for refund of the amount in the manner prescribed in the framework under the SEBI Circular."

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 Securityholder fails to provide the additional details within thirty (30) days from the date of receipt of communication from the Investment Manager directing the Securityholder 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 Securityholder from filing a fresh claim.

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

The provisions in respect of the claim by Securityholder, shall apply, mutatis mutandis, to the claim by legal heir/ successor/ nominee of the Securityholder. 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 Securities 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 Unclaimed 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 amount to the Escrow Account, upload the below mentioned details on the website of Trust:

Amount lying unclaimed (including penal interest, if any) (in INR)	Category (Interest/ Dividend/ Redemption Amount/ Any other)	No. of Security holders	Date when amount became due (dd/mm/yyyy)	Date when unclaimed amount was transferred to Escrow 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 Securityholder to verify if there is any unclaimed amount due to them and lying in the Escrow 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 amounts to the IPEF, upload the details on the website of the Trust, as given below:

Name of InvIT	Amount lying unclaimed in Escrow Account as at the end of seven years (in INR)	Category (Interest/ Dividend/ Repayment of Capital/ Any other)	No. of Securityholders	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 amounts of the Security holders including relevant documentation. The Investment Manager shall furnish necessary information, as and when called for by SEBI.

L. CONTACT DETAILS WHEREIN SECURITYHOLDER 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 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 SEBI Listing Regulations or circulars issued thereunder, without any action from the Investment Manager or approval of the Securityholders 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 securityholder to the Investment Manager /RTA along with supporting documents for claim of unpaid/unclaimed interest/redemption amounts)

Format of Application for Claiming Unclaimed Interest/Redemption 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 Interest/Redemption Amount

Dear Sir,

I hereby confirm that I have not received the Interest/Repayment Amount for the [●] quarter(s)/period of financial year(s) [●]. I have also verified the same from the Unpaid Interest/Repayment amount 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:

1.	Name of the Debenture Holder	
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 Interest/Redemption Account or Investor Protection and Education Fund)	
9.	Details of the bank account with Claimant Name, Account number and IFSC code where the unclaimed amount shall be credited through electronic mode.	

Signature of the Debenture Holder

Mandatory Enclosures:

1. Original CML duly stamped by the Depository Participant
2. Cancelled Cheque
3. Self-Attested copy of PAN
4. Self-attested proof of address

Annexure- B
(For Security Holders)

Format of Application for Claiming Unclaimed Interest/Redemption 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 Interest/Redemption Amount

Dear Sir,

I hereby confirm that I, *(Name)*, the Claimant am the legal heir/nominee of *(Name of Investor & DP ID, Client ID)*, the Debenture Holder. I further confirm that we have not received the interest/repayment amount for the [●] quarter(s)/period of financial year(s) [●]. I have also verified the same from the Unpaid Interest/Repayment amount 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:

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

Signature of the Claimant

Mandatory Enclosures:

1. Death Certificate of the Debenture Holder
2. Original CML duly stamped by the Depository Participant of deceased Debenture Holder and the Claimant
3. PAN Card copy of Claimant and the deceased Debenture Holder
4. Proof of Address of Claimant and the deceased Debenture Holder
5. Transaction Statement of one of the demat account (either source or destination demat account)

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

- (a) original death certificate of the securityholders 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.

