UNCLAIMED DISTRIBUTION POLICY

OF

ANANTAM HIGHWAYS TRUST

VERSION 1.0	AUGUST 26, 2025

UNCLAIMED DISTRIBUTION OF ANANTAM HIGHWAYS TRUST

A. Preamble

Alpha Alternatives Fund-Infra Advisors Private Limited ("**Investment Manager**") has been appointed as the investment manager of Anantam Highways Trust ("**Trust**"), an infrastructure investment trust registered with the Securities and Exchange Board of India ("**SEBI**") in accordance with the SEBI (Infrastructure Investment Trusts) Regulations, 2014, as amended ("**InvIT Regulations**").

This Policy (the "**Policy**") aims to provide a comprehensive process to be followed by unitholders and debenture holders for claiming their unclaimed or unpaid amounts and processing of same by Alpha Alternatives Fund-Infra Advisors Private Limited, Investment Manager of Anantam Highways Trust ("**Trust**"). It stipulates the format in which claim shall be submitted by the unitholder, 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. 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 unitholders for their unclaimed amounts transferred to the Unpaid Distribution/Interest Account or Investor Protection and Education Fund ("**IPEF**"), as the case may be.

Considering that it could be possible that the distribution amounts or the interest could remain unclaimed or unpaid because of various reasons, including failure to update account details by the unitholders.

C. Definitions

1. **"Applicable Law"** 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 the Securities and Exchange Board of India, whether in effect as of the date of this policy or thereafter, including but not limited to the InvIT Regulations (as defined below).

2. **"Authorised Person**" means any person duly authorised by the Board.

3. "**Board**" means the Board of Directors of the Investment Manager of Trust or any of the Committees constituted by it.

4. "**CML**" means client master ledger containing the current bank account details.

5. "**Depository Participant**" means any person registered as a depository participant with SEBI.

6. "**Investment Manager**" means Alpha Alternatives Fund-Infra Advisors Private Limited.

7. "**InvIT Regulations**" means the Securities and Exchange Board of India (Infrastructure Investment Trust) Regulations, 2014 as amended from time to time including the master circular issued SEBI dated July 11, 2025, bearing reference number SEBI/HO/DDHS-PoD-2/P/CIR/2025/102, and any other circular, notifications issued by SEBI in this regard.

8. "**IPEF**" means the Investor Protection and Education Fund constituted by the SEBI under the Securities and Exchange Board of India Act, 1992, as amended.

9. "**Listing Regulations**" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time including any circular, notifications issued thereunder.

10. "**Nodal Officer**" means the compliance officer of the Trust.

11. "**SEBI**" means Securities and Exchange Board of India.

12. "**Trust" or "InvIT**" means Anantam Highways Trust.

13. "**Units**" shall mean ordinary units issued by the InvIT.

14. "**Unitholders**" means any person who owns the ordinary units of the Trust.

15. "**Unpaid Amounts" or "Unclaimed Amounts**" or "**Unpaid/Unclaimed Amounts"** means such amounts for which the payment to any Unitholder has remained unpaid or unclaimed.

D. **Transfer of Unpaid/Unclaimed Amounts**

1 Where the Investment Manager has made distribution under regulation 18(6) of InvIT Regulations, but the payment to any unitholder has remained unpaid or unclaimed,

for the period within which the payment shall have been made in accordance with applicable law, the Investment Manager shall, within seven working days from the date of expiry of such period as prescribed under applicable law, transfer such unclaimed or unpaid amounts to an escrow account to be opened by the Investment Manager on behalf of the Trust termed as 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.

2 Any amount transferred to the Unpaid Distribution Account, 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 Investor Protection and Education Fund ("**IPEF**") within a period of thirty days from the date of expiry of seven years in the manner prescribed under SEBI the Applicable Law. The details of such amount transferred to IPEF shall be uploaded by the Investment Manager on the website of the Trust.

3 Unitholders entitled to any unclaimed/unpaid 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. The Investment Manager shall, after processing application received from the Unitholder holder for unclaimed or unpaid amount and satisfying itself of the correctness of information submitted shall remit the payment to the investor using electronic modes of funds transfer and thereafter, shall make an application to IPEF for refund of such amount in the manner prescribed under the Applicable Law

E. **Process for Filing of Claims:** The Unitholders shall follow the below mentioned process for filing of claims –

1. Submit the application in the format provided as Annexure – A1, A2, B as applicable.

2. The claim shall be submitted either by the Unitholders themselves or by their legal heir/ nominee. The legal heir/ successor/ nominee shall satisfy the provisions specified under the Listing Regulations, the circulars issued thereunder and other applicable law, as required.

3. Self-attested proof of identity, proof of address and proof of holding shall be submitted along with the application.

4. The Unitholders may submit their claims to the Nodal Officer of the InvIT by sending an email to the following email IDs: chandrakant.sharma@anantamhighways.com/ compliance@anantamhighways.com.

5. If any clarification is sought by Investment Manager on behalf of the Trust, the same

shall be submitted by the investors within 30 days from the date of receipt of such communication, failing which the claim may be rejected. However, rejection of claim does not debar a Unitholder from filing a fresh claim.

6. The claim may be rejected by the Trust if there are any discrepancies in the application or the documents are insufficient, and the Unitholders may re-file their claims on or after the date of intimation of discrepancies/ insufficiency. The claim can also be rejected if it has been previously processed or settled or is unspecific or incorrect.

7. The claim shall be processed by the Investment Manager within 30 days of the date of application subject to receipt of all documents and information as per the requirement. In case of discrepancies, the claim shall be processed within 30 days from the date of submission of revised documents to the satisfaction of the Investment Manager.

8. The Unitholders may raise queries/grievances relating to their claim or check status of their claim by sending an email to following email IDs:

:chandrakant.sharma@anantamhighways.com/compliance@anantamhighways.com
Phone No.: + 91 22 6145 8900

F. **Processing of Claim by the Trust:**

The Investment Manager shall follow the below mentioned steps for verification of claims before processing the same:

1. Upon receipt of a claim application, the Nodal officer shall check if all the documents submitted by the Unitholder are in order.

2. The claim shall be re-verified by the Nodal officer from the details published on the website of the Trust.

3. If any clarification is required, the same shall be intimated to the Unitholder(s) by sending an email or other written communication.

4. The Nodal officer may reject an application if there are any discrepancies in the application or the documents are insufficient.

5. If all the documents are in order, the Investment Manager shall remit the payment to the Unitholder using electronic modes for funds transfer within 30 days from the date of submission or receipt of complete information.

G. **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 amount to the Unpaid Distribution Account, upload the below mentioned details on the website of Trust:

Amount lying unclaimed (including penal interest,	Category (Interest/ Dividend/ Repayment of Capital/ Any other)	No. of Unitholders	Date when amount became due (dd/mm/yyyy)	Date when unclaimed amount was transferred to Unpaid Distribution Account	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 amount due to them and lying in the Unpaid Distribution/Interest 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	Category (Interest/ Dividend/ Repayment of Capital/ Any other)	No. of Unitholders	Date when amount became due for transfer to IPEF (dd/mm/yyy	Date when unclaimed amount was transferred to IPEF (dd/mm/yy	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 InvIT shall be updated by the Investment Manager by the seventh day of the succeeding month.

A. In case of any queries or grievances relating to the claim, the Unitholder can e-mail on chandrakant.sharma@anantamhighways.com/compliance@anantamhighways.com or call

at +91 22 6145 8900.

B. Maintenance of Records: The Trust shall preserve information pertaining to the unclaimed or unpaid amounts of the Unitholders including relevant documentation. The Trust shall furnish necessary information, as and when called for by SEBI.

C. Conflict with Applicable Law: The Policy shall not contradict with the provisions of any Applicable Law. In case of any discrepancy, the provisions of Applicable Law shall prevail over the provisions of this Policy.

D. Amendment

a. Any amendment to this Policy shall be undertaken by the Board of the Investment Manager or any duly constituted committee by the Board, in compliance with applicable law.

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

Adopted by the Board of Alpha Alternatives Fund-Infra Advisors Private Limited on behalf of the Trust on August 26, 2025.

Annexure- A1

Format of Application for Claiming Unclaimed Distribution Amount

To,
The Nodal Officer
Anantam Highways Trust
33rd Floor, Sunshine Tower,
Senapati Bapat Marg, Dadar West,
Mumbai 400 013

Subject: Request for Payment of Unclaimed Distribution

Dear Sir,

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 below 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.	Copy of the cancelled cheque Details of the leaf of the bank account with Unitholder Name, Account number and IFSC code where the unpaid dividend distribution amount shall be credited through electronic mode.	

Signature of the Unitholder

Mandatory Enclosures:

1. Original CML duly stamped by the Depository Participant
2. Cancelled cheque
3. Original distribution warrant / demand draft (if the validity period of the demand draft is not over)
4. Self-Attested copy of PAN
5. Self-attested proof of address- Passport, Bank Statement, driving license, Adhaar Card or Utility Bill (not older than 2 months); in case of non-resident Indians, copy of passport, overseas citizen of India, and person of Indian origin card to be provided

Annexure- A2

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

To,

The Nodal Officer
Anantam Highways Trust
33rd Floor, Sunshine Tower,
Senapati Bapat Marg, Dadar West,
Mumbai 400 013

Subject: Request for Payment of Unclaimed Distribution

Dear Sir,

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 below 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.	Account from which claim is being made: Unpaid Distribution Account or Investor Protection and Education Fund	
7.	PAN number (Claimant & Unitholder)	
8.	Mobile Number of the Claimant	
9.	Email ID of the Claimant	
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.	

Signature of the Claimant

Mandatory Enclosures:

1. Death Certificate of the Unitholder
2. Transaction Statement of one of the demat account (either source or destination demat account)
3. Original CML duly stamped by the Depository Participant
4. Cancelled cheque of the claimant
5. Original distribution warrant / demand draft (if the validity period of the demand draft is not over)
6. Self-Attested copy of PAN of the claimant and the deceased
7. Self-attested proof of address of the claimant and deceased - Passport, Bank Statement, driving license, Adhaar Card or Utility Bill (not older than 2 months); in case of non-resident Indians, copy of passport, overseas citizen of India, and person of Indian origin card to be provided
8. In case of non-individual unitholders – requisite documents evidencing the authorization to the person who is claiming the unpaid amount on behalf of the unitholder

Annexure - B

Format of Application for Claiming Unclaimed Distribution Amount transferred to IPEF

To,
The Nodal Officer
Anantam Highways Trust
33rd Floor, Sunshine Tower,
Senapati Bapat Marg, Dadar West,
Mumbai 400 013

Subject: Request for Payment of Unclaimed Distribution

Dear Sir,

I hereby confirm that I have not received the distribution for the **[●]** quarter(s) of financial year(s) **[●]** and that such amount has been transferred to IPEF. I have also verified the same from the search facility provided on the website of the InvIT with respect to funds transferred to IPEF. I request to make an application for refund of such amount to IPEF and am providing the below mentioned information and enclosing the scanned copies of the documents required in this regard:

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.	Copy of the cancelled cheque Details of the leaf of the bank account with Unitholder Name, Account number and IFSC code where the unpaid dividend distribution amount shall be credited through electronic mode.	

Signature of the Unitholder

Mandatory Enclosures:

1. Original CML duly stamped by the Depository Participant
2. Cancelled cheque
3. Original distribution warrant / demand draft (if the validity period of the demand draft is not over)
4. Self-Attested copy of PAN
5. Self-attested proof of address- Passport, Bank Statement, driving license, Adhaar Card or Utility Bill (not older than 2 months); in case of non-resident Indians, copy of passport, overseas citizen of India, and person of Indian origin card to be provided
6. In case of non-individual unitholders – requisite documents evidencing the authorization to the person who is claiming the unpaid amount on behalf of the unitholder