



POLICY ON CONTROL & MAINTENANCE OF STATIONERY

BACKGROUND

The Company, being a listed entity, is obligated to frame a policy for ensuring its control over the stationery including securities certificates, dividend warrants etc. in terms of the Circular No. EBI/HO/MIRSD/DOP1/CIR/P/2018/73 issued by the Securities and Exchange Board of India (SEBI) dated 20th April, 2018.

In any circumstance, where the terms of this Policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time as this Policy is changed to conform to the law, rule, regulation or standard.

DEFINITION

In this Policy unless the context otherwise requires

- a) "Company" means Gravita India Limited.
- b) "RTA" means Registrar & Transfer Agent of the Company.
- c) "Board" or "Board of Directors" shall mean the Board of Directors of the Company as may be re-constituted from time to time.
- d) "Authorised Person" shall mean any person authorised by the Board of Directors of the Company to control and maintain Company's Stationery.
- e) "Company's Stationery" shall include blank securities certificates, dividend/interest/ redemption/ warrants of the Company.
- f) "Securities" shall mean Securities as defined under Securities Contracts (Regulation) Act, 1956
- g) "Maintenance" means keeping documents, either physically or in electronic form.

INTENT & SCOPE

This Policy is being framed for maintenance and control of the Company's Stationery.

CUSTODY OF THE COMPANY'S STATIONERY

The Company's Stationery shall be kept in the safe custody of the Company Secretary / Authorised Person. Further, the RTA shall keep safe custody of the securities certificates and dividend/interest/ redemption/ warrants. However, any undelivered, unclaimed dividend warrants may be destroyed after 3 months from the date of issue till date of its expiry (3 months from date of issue). Once the validity is over, the RTA shall destroy the said dividend/interest/ redemption/ warrants in the presence of their auditors under supervision of Departmental Head.

MAINTENANCE OF REGISTER OF COMPANY'S STATIONERY

The RTA shall maintain a register of the Company's Stationery as available in their custody including securities certificates register with details of certificates issued/re-issued in respective folios, securities certificates printing register / records containing, inter alia, details such as Date of Printing/issue, Folio No., Name in which printed, Certificate No., Distinctive Nos., Old Certificate No. (in case of reprinting), Reason of printing etc. The register may be in physical or electronic form.

PERIODIC RECONCILIATION

The RTA and Company Secretary / Authorised Person shall maintain strict control on stationery as available in their custody. The stationery shall be periodically checked by physical verification and reconciliation report shall be maintained by the RTA and the Company Secretary / Authorised Person. The RTA shall send the reconciliation report of all stationery maintained, from time to time to the Company Secretary / Authorised Person.

GENERAL AUTHORISATION

The Board or any of its Committee may review the Policy from time to time as may be required. Changes, if any, shall be effective only upon approval by the Board.