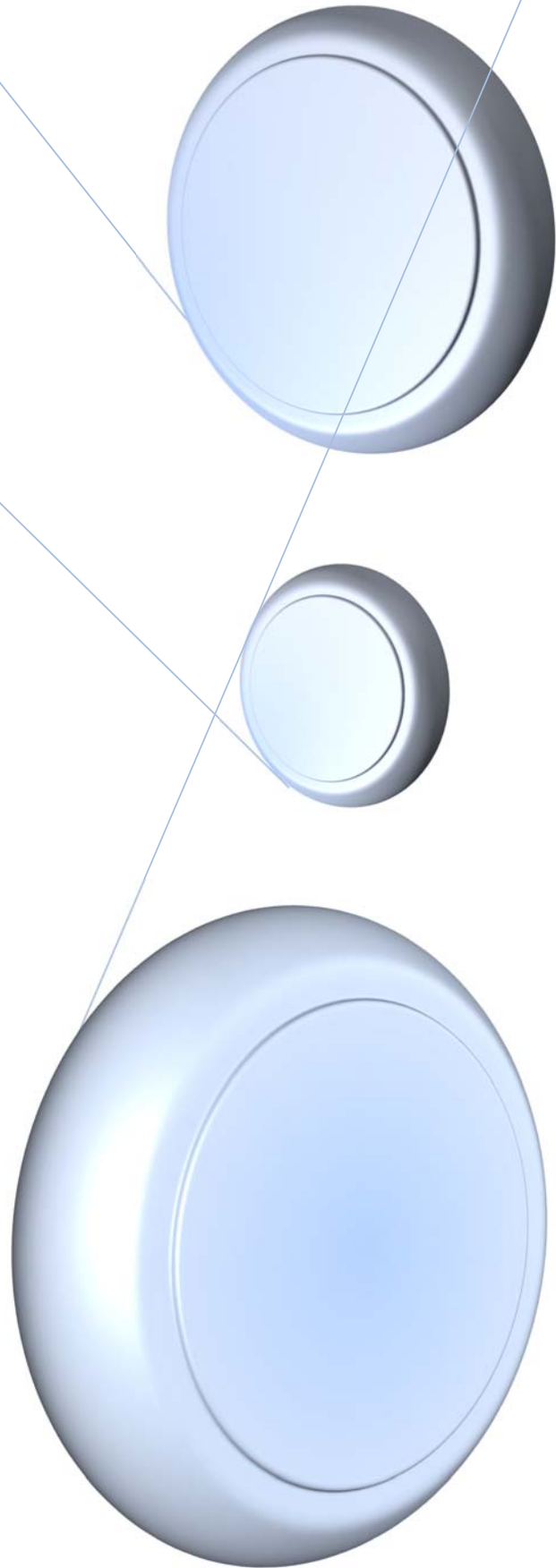


Aarti Surfactants Limited

**Policy On Preservation &
Utilisation Of Stationery- Blank
Security Certificates, Warrants**
Aarti Surfactants Limited

Compliance Department



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**POLICY ON PRESERVATION & UTILISATION
OF STATIONERY
BLANK SECURITY CERTIFICATES, WARRANTS.**

1. INTRODUCTION

- 1.1. Securities and Exchange Board of India (SEBI) vide its Circular No. SEBI / HO / MIRSD / DOP1/ / CIR / P / 2018 / 73 dated April 20, 2018 mandates every listed entities and the Registrar and Transfer Agents (RTA) to frame a written policy for maintaining strict control on the usage of stationery including blank certificates, dividend / interest / redemption warrants, etc. (Blank Stationery).
- 1.2. Accordingly, the Board of Directors have adopted this Policy (drafted in consultation with the Registrar and Share Transfer Agent of the Company) to comply with the requirements of abovementioned circular.

2. DEFINITIONS

- 2.1. **“Act”** means the Companies Act 2013 together with the Rules notified thereunder, including any statutory modifications or re-enactments thereof for the time being in force.
- 2.2. **“Board of Directors”** or **“Board”** means the Board of Directors of Aarti Surfactants Limited, as constituted from time to time.
- 2.3. **“RTA”** refers to Registrar and Share Transfer Agent of the Company.

3. OBJECTIVE OF THE POLICY

The objective of this Policy is to maintain strict control on the use, preservation and utilization of stationery by the Company and RTA.

4. MONITORING OF STATIONERY RELATED TO SECURITY CERTIFICATES:

- 4.1. The Blank Security Certificates shall be printed only on the authority of the Stakeholder Relationship Committee and the said authorization shall also include the quantity to be printed.
- 4.2. Proper record of the Blank Security Certificate lying with the Company and also delivered to RTA shall be maintained by the Company Secretary.
- 4.3. The Company (Or Printer appointed by them) while handing over/despaching the blank stationery to RTA to prepare a Delivery Challan/Slip mentioning the Quantity, From and To series of control number and obtain acknowledgement of the same from RTA.

- 4.4. The Security Certificate Stationery shall be kept in the custody of the Company Secretary and / or the RTA respectively.
- 4.5. The Company shall ensure that the Blank Security Certificate to be provided to the RTA shall have pre-printed control number printed on the reverse of the share certificate.
- 4.6. The Blank Security Share Certificate lying with the Company shall be used only with the permission of the Company Secretary.
- 4.7. RTA shall maintain the Register of the Blank Share Certificate with details of opening balance, receipt, issued, closing balance.
- 4.8. The Company shall provide blank share certificate to RTA when the inventory level reaches 25 number. As per this Policy, RTA can maintain up to a maximum of 100 blank share certificates at any given point of time.
- 4.9. The Company and the RTA shall physically verify the Blank Share Certificate lying with them on quarterly basis and prepare a reconciliation report of the same containing the reasons for deviations, if any.
- 4.10. The above report prepared by the RTA shall be forwarded to the Company Secretary within seven working days from the end of the quarter.
- 4.11. Deviation(s) observed, if any, in the said report shall be checked by the Company Secretary and shall be reported to the Chairman and / or the Managing Director of the Company, in case of suspicion of fraud or shortfall.
- 4.12. The said report shall be maintained by the Company Secretary and the RTA in their records.

5. MONITORING OF STATIONERY RELATED TO DIVIDEND/ INTEREST/ REDEMPTION (WARRANT STATIONERY) :

- 5.1. RTA is provided with blank Warrant Stationery for the purpose of processing Dividend/Interest/Redemption payments, where electronic mode of payment is not feasible.
- 5.2. The Company (or printer / agency appointed by the Company) shall while handing over/despaching the blank stationery to RTA shall prepare a Delivery Challan/Slip mentioning the Quantity, From and To series of MICR control number and obtain acknowledgement of the same from RTA.
- 5.3. RTA to maintain Register of Warrant stationery with details of Opening Balance, Receipt, Issued, Closing Balance.
- 5.4. Reconciliation Report of the blank stationery shall be maintained by both RTA and the Company.

5.5. RTA shall do over printing on the Dividend/Interest/Redemption Warrants as per the requirements, despatch the same to the Security holders and if the Company desires return the unused/cancelled stationery back to the Company within 30 days from the date of despatch of the warrants along with a Reconciliation of Number of blank stationery received, Number of Warrants printed, Number of Warrants Cancelled, balance unused stationery of warrants. Registrar and Transfer Agent will shred the unused/cancelled stationery between 31 days - 60 days if there is no request from the Company to return the same.

6. REVIEW

This Policy shall be reviewed and amended annually or as required by Act.

7. AMENDMENTS

7.1. Any modification in the policy on account of change in prevailing regulations will be carried out immediately, without any formal approval and will be informed to all concerns.

7.2. Any other modifications will be carried out only with the previous approval of Board.

7.3. Any amendment to the Policy shall be made in writing

8. IMPLEMENTATION

The Policy shall be effective from the date of approval by the Board unless specified otherwise.

9. VERSION CONTROL

Version	Date	Change along with reason /Review
