

GABRIEL INDIA LIMITED

POLICY ON CONTROL & MAINTENANCE OF STATIONERY

PREFACE

Securities and Exchange Board of India ('SEBI') has issued Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018 to Strengthen the Guidelines and Raising Industry standards for RTA, Issuer Companies and Banker to an Issue. SEBI mandated RTAs and Issuer Companies to frame a written policy and to maintain strict control on stationery including blank certificates, dividend/interest/redemption warrants and to periodically reconcile the physical verification.

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 Gabriel 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 Equity shares and Non-Convertible Debentures (NCDs) and Deposits issued by the Company from time to time.
- 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 and shall be effective from April 20, 2018.

CUSTODY OF THE COMPANY’S STATIONERY

The Company’s Stationery shall be kept in the safe custody of the Company Secretary / Authorised Person.

RTA shall keep safe custody of the securities certificates and dividend/interest/ redemption/ warrants 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.

RTA shall maintain a register containing details of records and documents destroyed. The register shall inter-alia contain the following particulars: description of the records and documents destroyed, name of authority authorizing the destruction, date of authorization of destruction, destroyed in whose presence (with signature) and date of destruction.

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, on a quarterly basis 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.

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Policy Reviewed On : 14.02.2020