

VIJI FINANCE LIMITED

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POLICY ON CONTROL AND MAINTENANCE OF STATIONERY

(PURSUANT TO SEBI CIRCULAR NO. SEBI / HO / MIRSD /DOP1/CIR/P/2018/73 DATED APRIL 20, 2018)

(Adopted by the Board of Directors at their meeting held on May 30 2018).

1. INTRODUCTION:

Securities and Exchange Board of India (SEBI) vide its Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018 mandates all listed entities and the Registrar and Share 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.

The Board of Directors of Viji Finance Limited at their meeting held on May 30, 2018 has adopted this Policy. The Company and the RTA shall be responsible for maintaining strict control on the usage of the Blank Stationery in accordance with this Policy.

2. DEFINITIONS :

- **“Company”** means Viji Finance Limited
- **“Board”** or **“Board of Directors”** shall mean the Board of Directors of the Company as may be re-constituted from time to time;
- **“Authorized Person”** shall mean Managing Director (**“MD”**), in the absence of MD, any person authorized by the Board / SRC of the Company to control, maintain and physically verify the Company’s Stationery;
- **“Company’s Stationery”** shall mean blank securities certificates, dividend / interest / redemption / warrants of the Company and such other stationery as may be notified by the Board;
- **“Maintenance or Maintain”** means process of preserving and keeping information / documents either physically or in electronic form including but limited to safe custody as to fire, theft, torn out, worn out or any form of destruction;
- **“RTA”** means Registrar & Transfer Agent appointed by the Company;
- **“Policy”** or **“this Policy”** means policy for maintaining usage of Blank Stationery including blank certificates, dividend / interest / redemption warrants, etc.;
- **“SEBI”** means the Securities and Exchange Board of India.

3. SAFE CUSTODY OF THE COMPANY'S STATIONERY

3.1 The Blank Stationery shall be printed only on the authority of the Board and the said authorization shall also include the quantity to be printed.

3.2 The Company's Stationery shall be kept in the safe custody of RTA.

3.3 RTA shall keep safe custody of the Company's Stationery (unissued and/or issued and valid, as applicable). RTA shall keep safe custody of the issued dividend / interest / redemption / warrants till date of its expiry .Once the validity is over, RTA shall, upon giving prior intimation to the Company, destroy the said dividend / interest / redemption/ warrants in the presence of their auditor.

3.4 The Company and the RTA shall physically verify the Blank Stationery lying with them on quarterly basis and prepare a reconciliation report of the same containing the reasons for deviations, if any.

3.5 The above report prepared by the RTA shall be forwarded to the Authorized Person of the company.

3.6 Deviation(s) observed, if any, in the said report shall be checked by the Authorized Person and shall be reported to the Chairman of the Company, in case of suspicion of fraud or shortfall.

3.7 The said report shall be maintained by the Authorized Person and the RTA in their records.

3.8 The Blank Stationery lying with the Company shall be used only with the permission of the Authorized Person.

4. MAINTENANCE OF REGISTER

4.1 RTA shall also prepare 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.

4.2 Pursuant to Clause 15 of Annexure II of SEBI Circular, RTA shall prepare quarterly register containing details of records and documents destroyed, as per SEBI Circular and / or para 3.2 of this policy, by it. 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. The authenticity of the register shall be verified during internal audit as prescribed under SEBI Circular. This register shall be maintained till perpetuity.

4.3 RTA shall send the above register(s) / reconciliation report(s), on quarterly basis to the Company.

4.4 RTA shall maintain the Register of the Blank Stationery with details of opening balance, receipt, issue and closing balance.

5. AMENDMENT IN THE POLICY:

The Board may amend this Policy from time to time to incorporate any subsequent amendment(s) / modification(s) brought in force by SEBI with respect to matters covered under this Policy.
