

POLICY ON CONTROL & MAINTENANCE OF STATIONERY

BACKGROUND

Thacker And Company Limited, being a equity 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. SEBI/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 Thacker And Company Limited
- b. "RTA" means Registrar & Transfer Agent of the Company.:Satellite Corporate Services Private Ltd
- 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 issued by the Company from time to time.
- g. "Maintenance" means keeping documents, either physically or in electronic form.

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 Share certificates and dividend / warrants as and when the company declares the dividend till the date of completion of printing. Once the printing of warrants is completed , the RTA shall forward the blank stationery with reconciliation to the Company for destruction under in the presence of authorized person.

MAINTENANCE OF REGISTER OF COMPANY'S STATIONERY

The RTA shall maintain a register of the Company's Stationery as available in their custody including share certificates register with details of certificates issued/re-issued in respective folios, share 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.

The RTA shall also maintain record containing details of records and documents forwarded to Company The register shall inter alia contain the following particulars: description of the records and documents destroyed, name of authority authorising 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. The record shall be maintained perpetuity.

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.

Place: Mumbai

Date: 28.05.2019

This Policy has been reviewed and approved by the Share Transfer Committee at its meeting held on 28.05.2019 and subsequently approved and adopted by the Board at its meeting held on 28.05.2019 and will become effective after 28.05.2019.