

SPECTRUM FOODS LIMITED

Regd. Office: L-5 BII Krishna Marg, C-Scheme, Jaipur-302001 Rajasthan Ph.: 2379483
CIN: L15499RJ1994PLC008016, E-mail: account@suryasalt.com

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

1. BACKGROUND AND APPLICABILITY

Securities and Exchange Board of India vide its Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated 20th April, 2018 ("SEBI Circular") requires the Company and its Registrar to frame a written policy on preservation & utilization of stationery - blank security certificates, warrants etc.

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:

In this Policy unless the context otherwise requires

- a. "Company" means Spectrum Foods Limited.
- b. "Board" means Board of Directors of Spectrum Foods Limited.
- c. "RTA" refers to Registrar and Share Transfer Agent of the Company.
- 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. "SEBI" means The Securities and Exchange Board of India.
- g. "Maintenance" means keeping documents, either physically or in electronic form.

3. OBJECTIVE:

The objective of this policy is to maintain strict control on stationery including blank certificates, dividend/interest/redemption warrants and shall periodically check by physical verification.

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4. 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.

5. 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.

6. 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.

7. AMENDMENT TO THE POLICY:

The Board is authorized to amend this policy from time to time at its sole discretion and/or in pursuance of any statutory notification, amendment or modifications as may be applicable.
