



**VLCC HEALTH CARE LIMITED**

**CIN: U74899DL1996PLC082842**

**STATIONERY CONTROL POLICY  
(THE “POLICY”)**

<b>Type:</b> Policy	<b>Owner:</b> Board of Directors	<b>Custodian:</b> Company Secretary
<b>Effective Date:</b>	<b>Latest Review:</b>	<b>Communication Plan:</b> Web
<b>Version:</b> 1	<b>Privacy Classification:</b> Open General	<b>Doc. No.</b> Listing Policy / FY 21-22

## 1. PREAMBLE

Securities and Exchange Board of India mandates all listed entities and the registrar to an issue and share transfer agents to frame a written policy for maintaining strict control on the usage of stationery including blank certificates, dividend / interest / redemption warrants, etc. ("**Blank Stationery**").

The Board of Directors of VLCC Health Care Limited has, at their meeting held on June 19, 2020, adopted this Policy. The Company (as defined below) and the RTA (as defined below) shall be responsible for maintaining strict control on the usage of the Blank Stationery in accordance with this policy.

## 2. DEFINITIONS

"**Act**" means the Companies Act, 2013 along with rules, notifications and circulars made/issued thereunder, as amended from time to time.

"**Applicable Laws**" include any statute, law, regulation, ordinance, rule, judgment, order, decree, bye-law, clearance, directive, guideline, notification and clarification issued by any governmental or statutory or regulatory authority or other governmental instruction and/or mandatory standards, as may be applicable to the Company, and as amended from time to time.

"**Board of Directors**" or "**Board**" means the board of directors of the Company, or a duly constituted committee thereof, as constituted / re-constituted from time to time.

"**Company**" means VLCC Health Care Limited.

"**Company Secretary**" shall have the same meaning as assigned to it under the Act.

"**Listing Regulations**" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

"**Policy**" means this policy for maintaining usage of Blank Stationery including blank certificates, dividend/ interest/redemption warrants, etc.

"**RTA**" means the Registrar and Share Transfer Agents of the Company.

"**SEBI**" means the Securities and Exchange Board of India.

"**Stakeholders Relationship Committee**" shall mean the committee constituted under the Act and the Listing Regulations.

Any other terms used in this Policy, and not defined herein, shall have the same meaning as assigned to such terms under the Act or any other Applicable Law.

### **3. MONITORING USAGE OF BLANK STATIONERY**

- 3.1. The Blank Stationery shall be printed only on the authority of the Company Secretary or any other person authorized by the Board and the said authorization shall also include the quantity to be printed.
- 3.2. Proper record of the Blank Stationery lying with the Company and delivered to the RTA shall be maintained by the Company Secretary.
- 3.3. The Blank Stationery shall be kept in the custody of the Company Secretary and/or the RTA respectively.
- 3.4. The Company and RTA shall maintain adequate control of the Blank Stationary.
- 3.5. The Blank Stationery lying with the Company shall be used only with the permission of the Company Secretary.
- 3.6. RTA shall maintain a register of the Blank Stationery recording details of opening balance, receipt, issue and closing balance.
- 3.7. The Company and the RTA shall physically verify the Blank Stationery lying with each of the Company and the RTA on quarterly basis and prepare a reconciliation report of the same, recording the reasons for deviations, if any (the “**Report**”).
- 3.8. The Report prepared by the RTA shall be forwarded to the Company Secretary within 7 (seven) working days from the end of the quarter of every financial year.
- 3.9. Deviation(s) observed, if any, in the Report shall be checked by the Company Secretary and shall be reported to the Stakeholders Relationship Committee, in case of suspicion of fraud or shortfall.
- 3.10. The Report shall be maintained by the Company Secretary and the RTA in their records.

### **4. AMENDMENT AND CONFLICT**

Any subsequent amendment/modification in the Applicable Laws shall automatically apply to this Policy. The Board has the right to amend or modify this Policy in whole or in part, at any time without assigning any reason, whatsoever. In the event of conflict between this Policy and any Applicable Laws, Applicable Laws shall prevail.