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MITCON
CONSULTANCY & ENGINEERING
SERVICES LTD.

**POLICY ON PRESERVATION AND UTILIZATION OF STATIONERY & DOCUMENTS –
BLANK SECURITY CERTIFICATES AND WARRANTS**

**(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 29th July, 2020



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1. PREAMBLE

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) require every Listed Company to formulate a policy on preservation of Documents which has to be approved by the Board of Directors.

SEBI circular dated April 20, 2018 has specified that the Company and Registrar and Share Transfer Agent (“RTA”) of the Company shall frame a written policy and shall maintain strict control of stationery including blank certificates, dividend/interest/redemption warrants. SEBI circular dated 20th April, 2018 has also specified that RTA shall maintain a register containing details of records and documents destroyed.

In this context, the following policy has been framed by the Board of Directors (“Board”) of MITCON Consultancy & Engineering Services Limited at its meeting held on 29th July, 2020 with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation and to align the same with provisions of SEBI circular dated April 20, 2018.

2. OBJECTIVE

The objective of this Policy is to classify the documents, records and registers of the Company which are required:

- i. to be preserved permanently and
- ii. to be preserved for a period not less than 8 years.
- iii. Other documents which are preserved as per standards prescribed under various statutes or procedures or practices of the company.

This policy further stipulates guidelines for maintenance and destruction of documents, accounting and usage of blank stationery and stationery requiring destruction.

3. DEFINITIONS

“Company” means MITCON Consultancy & Engineering Services Limited.



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“Board of Directors” or “Board” means the Board of Directors of MITCON Consultancy & Engineering Services Limited as constituted/ re constituted from time to time.

“RTA” means the Registrar and Share Transfer Agent of the Company.

“SEBI” means the Securities and Exchange Board of India.

“Stationery” means and include Bank Stationery viz. blank certificates (share, debenture or bond) and dividend, interest warrants and used stationery viz. returned undelivered certificates, cancelled or mutilated certificates, exchange certificates or certificates surrendered for redemption or exchange, dividend/interest warrants and en-cashed dividend/interest warrants.

“Maintenance” means keeping documents either physically or in electronic form.

4. MONITORING USAGE OF STATIONERY

- i. The Stationery shall be printed only on the authority of the Stakeholders Relationship Committee / Company Secretary and the said authorization shall also include the quantity to be printed.
- ii. Proper record of the Stationery lying with the Company and also delivered to RTA shall be maintained by the Company Secretary.
- iii. The Stationery shall be kept in the custody of the Company Secretary and / or the RTA respectively.
- iv.
- v. The Company and RTA shall maintain adequate control of the blank Stationery.
- vi. The Stationery lying with the Company shall be used only with the permission of the Company Secretary.
- vii. RTA shall maintain the Register of the Stationery with details of opening balance, receipt, issued and closing balance.
- viii. The Company and the RTA shall physically verify the Stationery lying with them on a quarterly basis and prepare a reconciliation report of the same containing the reason for deviation, if any.



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- ix. The above report prepared by the RTA shall be forwarded to the Company Secretary within seven working days from the end of the quarter.
- x. Deviation(s) observed, if any, in the said 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.
- xi. The said report shall be maintained by the Company Secretary and the RTA in their records.
- xii. RTA shall ensure compliance of all Ministry of Corporate Affairs / SEBI regulations / directions etc., as applicable for the time being and as amended from time-to time.

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.
