

POLICY ON CONTROL & MAINTENANCE OF STATIONERY

BACKGROUND

Srei Equipment Finance Limited, being a debt 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.

"In exercise of the powers conferred on the Reserve Bank of India (RBI) under Section 45-IE (1) of the RBI Act, 1934, the Reserve Bank of India (RBI) has issued an Order / Press Release w.r.t. the Supersession of the Board of Directors of Srei Equipment Finance Limited with immediate effect. Shri Rajneesh Sharma has been appointed as the Administrator under Section 45-IE(2) of the RBI Act, 1934. Further, pursuant to the Order dated 8th October, 2021 of the National Company Law Tribunal, Kolkata Bench ("NCLT"), corporate insolvency resolution process ("CIRP") has been initiated against Srei Equipment Finance Limited as per the provisions of the Insolvency and Bankruptcy Code, 2016 ("Code"). The affairs, business and property of Srei Equipment Finance Limited are being managed by the Administrator, Mr. Rajneesh Sharma, who acts as agent of the Company only and without any personal liability.

Therefore, any reference to the words "Board/ Committee" in the Policy/Code shall be referred to as "Administrator/Core Strategic Committee/Any other Committee" till the Policy/Code is modified/revised or till the completion of CIRP

DEFINITION

In this Policy unless the context otherwise requires

- a. "**Company**" means Srei Equipment Finance Limited.
- b. "**RTA**" means Registrar & Transfer Agent of the Company.
- 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 and Non-Convertible Debentures (NCDs) issued by the Company from time to time.
- g. **“Maintenance”** means keeping documents, either physically or in electronic form.

INTENT & 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 securities certificates and dividend/interest/ redemption/ warrants 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.

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.

The RTA shall also maintain a register containing details of records and documents destroyed. 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 register shall be maintained till 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: Kolkata

Date: 13.02.2022

This Policy has been reviewed by the Corporate Governance and Audit Committee at its meeting held on 17.12.2021 and recommended by Core Strategic Committee at its meeting held on 13.02.2022 to the Administrator and will become effective on and after 13.02.2022 as approved by the Administrator on 13.02.2022.