HATHWAY BHAWANI CABLETEL & DATACOM LIMITED

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 & utilisation of stationery - blank security certificates, warrants etc.

Accordingly, the Board of Directors have adopted this Policy on January 24, 2019 (drafted in consultation with the Registrar and Share Transfer Agent of the Company) to comply with the requirements of abovementioned circular.

2. Definitions:

"Board" means Board of Directors of Hathway Bhawani Cabletel and Datacom Limited

"Company" means Hathway Bhawani Cabletel and Datacom Limited

"RTA" refers to Registrar and Share Transfer Agent of the Company

"SEBI" means The Securities and Exchange Board of India

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.

4. Matters relating to Security Certificates:

- RTA is provided with blank security certificates by the Company for the purposes of processing transactions that requires printing and issuance of new/duplicate/replacement/exchange/split/bonus Security Certificates.
- The Company to ensure that the blank stationery to be provided to RTA shall have preprinted control number printed on the reverse of the certificate and the control of the same shall be maintained by the Company. RTA to make request to the Company which would be initiated by the concerned Client Co-ordinator ("CC").
- The Company (Or Printer appointed by them) while handing over/despatching the blank stationery to RTA to prepare a Delivery Challan/Slip mentioning the from and to series of control number and obtain acknowledgement of the same from RTA.

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- RTA to maintain a Register of Security Certificates with details of Opening Balance, Receipt, Issued, Closing Balance.
- The CC after the Certificate is printed shall send the duly printed Security Certificate to the Company for their signature and authentication and further despatch to the Security holders.
- The Company shall provide requisite blank Security Certificates to RTA when the inventory level reaches 100 numbers. As per this policy, RTA may maintain upto a maximum of 250 security certificates at any given point in time.
- Reconciliation/Control Report of the blank stationery shall be maintained by both RTA and the Company.

5. Matters relating to Dividend/Interest/Redemption Warrant Stationery ("Warrant Stationery"):

- RTA is provided with blank Warrant Stationery for the purpose of processing Dividend/Interest/Redemption payments, where electronic mode of payment is not feasible.
- The Company (or printer / agency appointed by the Company) shall while handing over/despatching the blank stationery to RTA shall prepare a Delivery Challan/Slip mentioning the From and To series of MICR control number and obtain acknowledgement of the same from RTA.
- RTA to maintain Register of Warrant stationery with details of Opening Balance, Receipt, Issued, Closing Balance.
- RTA shall do over printing on the Dividend/Interest/Redemption Warrants as per the requirements, despatch the same to the Security holders and if the Company desires return the unused/cancelled stationery back to the Company within 30 days from the date of despatch of the warrants along with a Reconciliation of Number of blank stationery received, Number of Warrants printed, Number of Warrants Cancelled, balance unused stationery of warrants. LIIPL will shred the unused/cancelled stationery between 31 days 60 days if there is no request from the Company to return the same.
- Reconciliation Report of the blank stationery shall be maintained by both RTA and the Company.
- 6. Amendment to the Policy:

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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.
