

## AKG EXIM LIMITED

CIN: L00063DL2005PLC139045

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### **“STATIONERY MONITORING POLICY”**

#### **INTRODUCTION:**

Pursuant to Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018 issued by Securities & Exchange Board of India requires every company and its Registrar and share Transfer Agents, if any, to frame a written policy for maintaining strict control on the usage of preprinted, pre-signed blank stationary including blank share certificate(s), dividend warrant(s)/interest slip(s)/redemption warrants etc. (the preprinted, pre-signed blank stationary)

Accordingly, Board of Directors of **AKG Exim Limited** has adopted this Policy in consultation with RTA by passing of resolution in the Board Meeting (through Video conferencing Mode “VCM”) held on **9<sup>th</sup> December, 2020**. The Company and the RTA shall be responsible for maintaining strict control on the usage of the preprinted pre-signed blank stationary in accordance with this Policy.

#### **1. DEFINITION:**

“**Board of Directors**” or “**Board**” means the Board of **AKG Exim Limited** as constituted/re-constituted from time to time.

“**Company**” means **AKG Exim Limited**.

“**Policy**” or “**this Policy**” means Policy for Monitoring usage of preprinted pre-signed blank stationary including blank share certificates, dividend warrant(s)/interest slip(s)/redemption warrant(s) etc.

“**Preprinted Pre-signed blank stationary**” means any stationary containing the signatures(manual/printed) of the Director(s) and / or space for signature of Company Secretary / Authorized Signatory(ies) / Officials(s), wherever applicable, of the Company.

“**RTA**” means **MAS Services Limited**, the Registrar and Share Transfer Agent appointed by the Company.

“**SEBI**” means Securities & Exchange Board of India.

#### **2. MONITORING USAGE OF THE PREPRINTED PRE-SIGNED BLANK STATIONARY:**

- A) Preprinted Pre-signed blank stationary shall be printed only on the authority of the Board through Company Secretary duly authorized in this behalf which shall include the quantity and serial number of stationery to be printed.

Blank Pre-printed Pre-signed stationery shall be handed over to RTA with duly signed forwarding letter by Company Secretary, which must include serial number of stationery being forwarded to RTA.

- B) The Company Secretary shall maintain the proper records of the preprinted Pre-signed blank stationary lying with it.
- C) RTA shall be maintain the record of preprinted pre-signed blank stationary received from the Company together with utilization of such preprinted pre-signed blank Stationary. RTA shall on quarterly basis or at such other times, shall report to the Company in writing towards stock of preprinted pre-signed stationary lying with it along with certificate of utilization of the same in the manner / format mutually agreed between the Company and / or prescribed by SEBI, from time to time.
- D) Preprinted Pre-signed blank stationary shall be kept in the safe custody of the Company Secretary / as per instruction of Board and/or with the RTA, as the case may be, under lock and key.
- E) Preprinted Pre-signed blank stationary lying with the Company shall be used only with the permission with the Company Secretary & Compliance Officer / as per instruction of Board.
- F) The Company and the RTA shall physically verify Preprinted Pre-signed blank stationary lying with them on quarterly basis and prepare a reconciliation report of the same containing the reasons for deviation, if any.
- G) The abovementioned report prepared by the RTA shall be forwarded to the Company Secretary & Compliance / Board of the Company within Seven (07) working days from the end of each quarter and Financial Year and the Company Secretary shall cause to present the same to the Board of Director at the Board Meeting held during the quarter.
- H) Deviation(s) observed in the report of RTA shall be analyzed by the Company Secretary & Compliance Officer / Board and reported to the Managing Director and CFO of the Company in case of suspicion or fraud or shortfall.
- I) The abovementioned report shall be maintained by the Company Secretary & Compliance Officer / Board and RTA in their records for a period of 10 (Ten) Years.

### **3. AMENDMENT IN THE POLICY:**

Board may amend this Policy from time to time to incorporate any subsequent amendment(s)/modification(s) brought in force by SEBI and / or as per suggestion of RTA / Board / Company Secretary & Compliance Officer, with respect to matters covered under this Policy or otherwise.