

**Policy for Monitoring Usage of Presigned Blank Stationery / Certificates,
Warrants etc.**

**[Pursuant to SEBI Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73
dated April 20, 2018]**

INTRODUCTION

Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018 issued by the Securities & Exchange Board of India (SEBI) requires the Company and its Registrar and Share Transfer Agents (RTA) to frame a written policy for maintaining strict control on the usage of presigned blank stationery including blank certificates, dividend/interest/redemption warrants etc. (the presigned blank stationery).

Accordingly, the Board of Directors of Fineotex Chemical Limited has adopted this Policy (drafted after consultation with RTA) in its Meeting held on May 30th, 2018. The Company and the RTA shall be responsible for maintaining strict control on the usage of the presigned blank stationery in accordance with this Policy.

I. DEFINITIONS

“Board of Directors” or “Board” means the Board of Directors of Fineotex Chemical Limited as constituted/re-constituted from time to time.

“Company” means Fineotex Chemical Limited.

“Policy” or “this Policy” means policy for monitoring usage of presigned blank stationery including blank certificates, dividend/interest/ redemption warrants etc.

“Presigned blank stationery” means any stationery containing the signatures (manual/ printed) of the Director(s) or Official(s) of the Company.

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

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

II. MONITORING USAGE OF THE PRESIGNED BLANK STATIONERY

- A) The presigned blank stationery shall be printed only on the authority of the Board and the said authorization shall also include the quantity to be printed.
- B) Proper record of the presigned blank stationery lying with the Company and also delivered to RTA shall be maintained by the Company Secretary.
- C) The presigned blank stationery shall be kept in the custody of the Company Secretary and/or the RTA respectively under lock & key.

- D) The presigned blank stationery lying with the Company shall be used only with the permission of the Company Secretary.
- E) The Company and the RTA shall physically verify presigned blank stationery lying with them on quarterly basis and prepare a reconciliation report of the same containing the reasons for deviation, if any.
- F) The abovementioned report prepared by the RTA shall be forwarded to the Company Secretary within seven (7) working days from the end of the quarter.
- G) Deviation(s) observed in the abovementioned report shall be analyzed by the Company Secretary and reported to the Chairman & Managing Director of the Company in case of suspicion of fraud or shortfall.
- H) The abovementioned report shall be maintained by the Company Secretary and the RTA in their records.

III. 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 or otherwise.