STATIONARY POLICY

(Pursuant to SEBI Circular- SEBI/HO/MIRSD/DOP1/CIR/P/2018/73)

R K SWAMY LIMITED

(Duly approved by board of Directors of the company through meeting held on November 30, 2023)

1. PREAMBLE:

Securities and Exchange Board of India (SEBI) vide its Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018 mandates the listed entity and its Registrar and share Transfer Agents (RTA) to frame a written policy for maintaining strict control on the usage of preprinted **pre-signed blank stationery** including blank share certificates, dividend/interest/redemption warrants etc. (the preprinted pre-signed blank stationery)

2. OBJECTIVE:

a. To comply with the provision of (SEBI) vide its Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018.
b. To maintain strict control on the usage of the preprinted pre-signed blank stationeryby RTA and Company in accordance with this Policy.

3. DEFINITION:

a. "**Board of Directors**" or "**Board**" means the collective body of the Board of Directors of the Company, as constituted from time to time.
b. "**Company**" means R K Swamy Limited.
c. "**Policy**" means Policy for Monitoring usage of preprinted pre-signed blank stationery including blank share certificates, dividend/interest/redemption warrants etc.
d. "**Pre-printed Pre-signed blank stationery**" means any stationery containing the signatures (manual/printed) of the Director(s) or Officials(s) of the Company.
e. "**RTA**" means the Registrar and Share Transfer Agent of the Company.
f. "**SEBI**" means Securities & Exchange Board of India.

4. MONITORING USAGE OF THE PRE-SIGNED BLANK STATIONERY:

1. Pre-printed Pre-signed blank stationery shall be printed only on the authority of the Stakeholder Relationship Committee and the said authorization shall also include the quantity and serial number of stationeries to be printed.

2. Blank pre-printed stationery will be handed over to RTA with forwarding letter only and serial number of stationeries will be mentioned in letter.

3. Proper record of the Pre-printed Pre-signed blank stationery lying with the Company and also to RTA shall be maintained by the Company Secretary of the Company.

4. The Company and the RTA shall physically verify Pre-printed Pre-signed blank stationery lying with them on quarterly basis and prepare a reconciliation report of the same containing the reasons for deviation, if any.

5. The abovementioned report prepared by the RTA shall be forwarded to the Company

within 15 (Fifteen) days from the end of the quarter.

6. Deviation(s) observed in the abovementioned report shall be analyzed by the Company Secretary of the Company and reported to the Managing Director of the Company in case of suspicion or fraud or shortfall.

7. The above-mentioned report shall be maintained by the Company Secretary of the Company and the RTA in their records.

8. Balance pre-printed stationery of dividend warrant/interest warrant/redemption warrant will be shared by the RTA/ Company Secretary of the Company after expiry of valid period.

5. REVIEW AND AMENDMENT:

This policy is framed pursuant to the Securities and Exchange Board of India (SEBI) vide its Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018. In case of any subsequent amendments to the circulars which make any of the above provisions in the Policy inconsistent, the provisions of the Circular shall prevail.

The Policy shall be reviewed by the Board so as to align the same with the amendments or to incorporate the changes as may be felt appropriate by the Board.

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