DIVIDEND DISTRIBUTION POLICY

OF
STELLANT SECURITIES (INDIA) LIMITED
(CIN: L64920MH1991PLC064425)

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1. PREAMBLE

Pursuant to the provisions of Regulation 43A(1) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, the Board of Directors of the Company has adopted this Dividend Distribution Policy.

This Policy sets out the parameters and circumstances to be considered by the Board in determining the distribution of dividends to shareholders.

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2. OBJECTIVE

The objective of this Policy is to:

- Provide a transparent framework for dividend declaration
- Ensure equitable distribution of profits
- Balance the interests of shareholders and the Company's growth
- Comply with applicable statutory and regulatory requirements

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3. APPLICABILITY

This Policy shall be applicable to the Company and shall be disclosed on the website of the Company.

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4. PARAMETERS FOR DECLARATION OF DIVIDEND

The Board shall consider the following parameters while declaring dividend:

4.1 Financial Parameters

- Profit after tax
- Accumulated reserves

- Cash flows and liquidity position
- Capital expenditure requirements

4.2 Internal Factors

- Business expansion plans
- Working capital requirements
- Debt obligations and leverage position
- Retention of earnings for future growth

4.3 External Factors

- Economic environment
- Industry outlook
- Regulatory changes
- Market conditions

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5. CIRCUMSTANCES UNDER WHICH SHAREHOLDERS MAY OR MAY NOT EXPECT DIVIDEND

5.1 Shareholders May Expect Dividend When:

- The Company has adequate profits and cash flows
- There are no significant expansion or capital requirements
- The Company has stable earnings

5.2 Shareholders May Not Expect Dividend When:

- The Company is in growth or expansion phase
- There are significant capital expenditure requirements
- There is inadequate profit or cash flow
- There are adverse economic or regulatory conditions

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6. UTILIZATION OF RETAINED EARNINGS

Retained earnings may be utilized for:

- Business expansion and growth
- Investment in subsidiaries or new projects
- Repayment of debt
- Strengthening of reserves

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7. PARAMETERS FOR VARIOUS CLASSES OF SHARES

- The Company currently has only one class of equity shares
- Dividend shall be distributed equally to all shareholders in proportion to their shareholding

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8. INTERIM DIVIDEND

The Board may declare interim dividend during the financial year based on financial performance and cash availability.

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9. FINAL DIVIDEND

Final dividend shall be recommended by the Board and approved by shareholders at the Annual General Meeting.

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10. AMENDMENT

The Board of Directors reserves the right to amend this Policy from time to time in accordance with applicable laws.

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11. DISCLOSURE

This Policy shall be:

- Disclosed on the website of the Company
- Included in the Annual Report

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12. EFFECTIVE DATE

This Policy shall come into effect from _____.

By Order of the Board
For Stellant Securities (India) Limited

Company Secretary & Compliance Officer

Date: _____
Place: Mumbai
