

Policy for Preservation of Documents

- **Foreword**

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires every listed entity having listed its securities on recognised stock exchange(s) to formulate a policy for Preservation of Documents. The Company has, accordingly, adopted the following policy for Preservation of Documents at its Board meeting held on 03rd November, 2015.

- **Objective of the Policy**

The objective of the Policy is to make a frame work for classification of documents which are required to be preserved permanently or at least for 8 years and to ensure their availability for easy retrieval, when needed.

- **Time period for preserving the document**

Time period for preserving the document shall be classified into two categories:

1. Documents required to be maintained permanently
2. Documents required to be maintained at least for 8 years

Following documents shall be maintained permanently

- a) Immovable property related documents
- b) Government approval letters, sanction letters, permissions from government authority, Court Orders, Legal Agreements, and any other Statutory and Legal documents.
- c) Register of Loans, Guarantee, security and acquisition made by the Company (Form MBP 2)
- d) Register of Investments (Form MBP 3)
- e) Register of Contracts (Form MBP 4)
- f) Register of Charge
- g) Register of Members with Index (including Foreign Register of Members)
- h) Annual Returns
- i) Minutes of General Meetings
- j) Minutes of Board and Committee Meetings
- k) Register of renewed and duplicate share certificates
- l) Memorandum and Articles of Association
- m) Documents evidencing ownership of intellectual property rights

- n) Notice of meetings of shareholders and creditors including the agenda and explanatory statements and minutes thereto.
- o) Agenda List for the meetings of the Board of Directors.
- p) Certificate of incorporation of the Company, certificates of registration, licenses, permits, consents etc. under various statutory laws – e.g. Factories Act, GPCB etc.

Following documents shall be maintained for 9 years

- a) Books of Accounts, Purchases, Sales including vouchers
- b) Disclosure from Directors (Form MBP 1 and DIR-8)
- c) Dividend Register & paid instruments
- d) Register of Fixed Deposits
- e) Register of FD Interest & paid instruments
- f) Instruments creating a charge and modification
- g) Register of debenture-holders including an index of the names
- h) Foreign register of debenture-holders
- i) Registers of Members including index of the names
- j) Register of Foreign members
- k) Annual return and copies of all certificates and documents required to be annexed thereto.
- l) All books and documents relating to the issue of share certificates
- m) Returns, disclosures, filings, etc. with regulatory authorities under various enactments - e.g. periodical reports/returns to SEBI, Stock Exchange, authorities under the laws relating to income-tax, excise and customs, service tax, value added tax, sales tax, etc.
- n) Notes on agenda for meetings of the Board of Directors and its Committees.

Following documents shall be maintained at least for 1 year beyond the period of their relevance:

- a) Confidentiality and non-disclosure agreements
- b) Records relating to employees
- c) Documents relating to litigation or arbitration
- d) Commercial contracts
- e) Bonds, undertakings etc lodged with the concerned authorities under various laws – e.g. Customs and Central Excise law.

- **Mode of preservation of Document**

The company shall preserve documents in electronic or physical form with proper security for accessing documents

- **Safe keeping of Documents**

Documents required to be preserved shall be kept at a safe and secured place so that they are protected from destruction or decay. The Company shall maintain proper infrastructure for keeping records and documents in a secured and systematic manner for their safety and easy retrieval.

The Company shall maintain a Register of the Permanent Documents and Documents to be preserved for 9 years, with the Title or Brief Description and date of the document, place where preserved and name of the custodian of the document.

In cases where the original document is not available then a copy of such document if available shall be preserved permanently and a note shall be made in the Register of Documents.

Safekeeping of documents preserved physically:

1. Proper place and cupboard or racks which are fire and weather proof should to be used for storing of documents.
2. Care should be taken to prevent fire at the storage/record room.
3. Storage/Record rooms should be kept clean, so that pests, fungus, rats do not damage documents.
4. Good quality files should be used for filing of documents.
5. A register and Index of the documents stored should be maintained and updated from time to time.
6. Important documents should be kept secured in the custody of responsible person. The custodian shall maintain record of temporary removal and issue of Document against requisition and return of the document.

Safekeeping of document preserved electronically:

1. Computers, Servers and Laptops, hard discs, electronic storage media, where files are stored should be protected from virus and updated
2. Backups of the documents should be maintained and updated from time to time.
3. Important documents should be kept protected by password.

A G Shroff
Managing Director