



POLICY ON PRESERVATION OF DOCUMENTS

With a view to bring economy of space, efficiency in retrieval of documents , the need for storage of electronic data/information and preservation of documents in accordance with various statutes, this Policy needs to be adhered by all the Departments of the Company across all locations. This policy is being framed in compliance with the requirements stipulated under Regulation 9 of the SEBI(Listing Obligations and Disclosure Requirements) Regulations 2015 (LODR)

A) Preservation of documents - Permanent In Nature

1. Register of investments not held in its own name by the company
2. Register of investments other than securities not held in name of the company
3. Register of Members including an index of the names
4. Register of Renewed and Duplicate Share Certificates
5. Register of contracts with related party and contract with Bodies Corporate etc. in which directors are interested
6. Register of Directors & Key Managerial Personnel
7. Register of Directors Shareholding
8. Register of loans, guarantee, security and acquisition made by the Company
9. Register of documents and records destroyed
10. Register of transfer of shares
11. Register of transmission of shares
12. Register in respect SEBI Takeover Code
13. Minutes of the Board or Committee Meetings
14. General Meeting Minutes
15. Court Orders and CLB Orders

B. Documents with preservation period of not less than 8 years after completion of the relevant transactions.

1. Register of Allotment
2. Register of Charges
3. Register of Deposits
4. Register of payment of dividend
5. Attendance Register of Meetings of the Board/Committee
6. Register of Proxies
7. Register of inspection
8. Register of Investor Complaints
9. Books of Accounts and other relevant books, papers and financial statements
10. Annual return and copies of all certificates and documents required to be annexed thereto.



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C. Documents to be preserved as long as they remain current or for not less than 8 years, whichever is later.

1. Disclosure received under SEBI Takeover Code
2. General Meeting records
3. Disclosures/ Notices by a Director of his interest
4. Various Agreements
5. Certificate from Secretarial Auditors
6. Documents filed with ROC
7. Copies of MOA & AOA
8. Certificates issued by ROC
9. Annual Reports
10. Replies to show cause notice

D. Other documents and Registers

Dividend Reconciliation statement, scrutinizer's report on postal ballot and office copy of the Notices relating to the same, register as required under SEBI takeover code, Insider Trading Regulations and all books and documents relating to the issue of share certificates, including the blanks forms of share certificates - To be preserved for the period as mentioned in applicable law/regulation/ guideline/ statute etc.

Manner of Preservation and Maintenance

1. Preservation and maintenance of documents, registers and records shall mean the maintenance of such documents, registers and records either physically or in electronic form as may be permitted under any law for the time being in force and will include the making of appropriate entries therein, the authentication of such entries and the preservation of such documents, registers and records.
2. Books of account and other relevant books, papers and financial statements for a period of not less than 8 financial years immediately preceding a financial year shall be kept in accordance with the provisions of Section 128 of the Companies Act, 2013/ as per the Board Resolution/ approval given by the shareholders of the company earlier.
3. Register of members and other relevant documents shall be maintained at the office of the Registrar and Share Transfer Agents and other statutory registers as specified under the Companies Act, 2013 shall be kept as per the Board Resolution/ approval given by the shareholders of the company earlier
4. Other documents shall be preserved either at the Registered Office or such other location as may be decided by the Managing Director



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The documents may be preserved in Physical form or Electronic form. and documents preserved in electronic form shall be maintained in accordance with the IT Policy of the Company, as may be amended from time to time.

The preservation of documents should be such as to ensure that there is no harm to the content of the records. The preserved documents must be accessible at all reasonable times by the officers of the Company.

Amendment

The Managing Director is empowered to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.