Policy for Preservation of Documents (Pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

This Policy (the Policy) is being framed in compliance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the New Regulations).

A. Documents whose preservation shall be permanent in nature

Register of:

1. Investments not held in its own name by the company
2. Investments other than securities not held in name of the company
3. Members including an index of the names
4. Renewed and Duplicate Share Certificates
5. Contracts with related party and contract with Bodies Corporate etc. in which directors are interested
6. Directors & KMP
7. Directors Shareholding
8. Loans, guarantee, security and acquisition made by the Company
9. Common Seal
10. Documents and records destroyed
11. Transfer of shares
12. Transmission of shares
13. SEBI Takeover Code
14. Minutes of the Board or Committee Meetings
15. General Meeting Minutes
16. Court Orders and CLB Orders

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

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

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Other Documents & Registers to be preserved:

Dividend Reconciliation Statement, Scrutinizers Report on Postal Ballot and office copy of the Notices relating to the same, register in respect of SEBI (Prohibition of Insider Trading) Regulations, 2015 and all books and documents relating to the issue of share certificates, including the blank 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 at the Registered Office of the Company in accordance with the provisions of Section 128 of the Companies Act, 2013. Any decision to maintain the books of account and other relevant papers at a location in India other than the Registered Office shall be effected after complying with the requirements of Section 128 of the Companies Act, 2013
3. Register of members and other relevant documents shall be maintained at the office of the Registrar and Share Transfer Agents.
4. Other statutory registers as specified under the Companies Act, 2013 or any other law shall be kept at the Registered Office of the Company.
5. Other documents shall be preserved either at the Registered Office or such other location as may be decided by the Managing Director or Company Secretary.

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