

**POLICY ON PRESERVATION OF DOCUMENTS AS PER  
SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING  
OBLIGATIONS AND DISCLOSURE REQUIREMENTS)  
REGULATIONS, 2015 AND COMPANIES ACT, 2013**

## **1. INTRODUCTION**

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'Listing Regulations') and Companies Act, 2013. Archival Policy as referred to in Regulation 30 (8) of the Listing Regulations forms part of this Policy. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of Companies Act, 2013.

## **2. PURPOSE OF THE POLICY**

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-

- a) documents whose preservation shall be permanent in nature ;
- b) documents with preservation period of not less than eight years after completion of the relevant transactions. Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents are required to be preserved permanently or up to a certain prescribed time.

Accordingly this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

## **3. POLICY**

### **3.1 PRESERVATION OF DOCUMENTS**

**(A) Preservation of Documents with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

- 1) the documents whose preservation shall be permanent in nature

➤ **Annexure 1** of this policy contain the details of documents whose preservation shall be permanent in nature.

- 2) documents with preservation period of not less than eight years after completion of the relevant transactions

➤ **Annexure 2** of this policy contain the details of documents with preservation period of not less than eight years after completion of the relevant transactions.

- 3) documents with preservation period other than those mentioned in 2) above

➤ **Annexure 3** attached herewith contain the details of documents with preservation period other than those mentioned in 2) above.

**(B) Documents to be made available on the website of the Company as required by the Companies Act, 2013 and the Listing Regulations**

1. The Company is to maintain a functional website containing
  - > the basic information about the Company,
  - > All Information and/or documents as specified in the applicable provisions of Companies Act, 2013,
  - > All Information and/or documents as specified in Regulation 46 (2) of the Listing Regulations,
  - > All Information and/or documents mentioned in Part (B) of Annexure 2 of this policy, which are required to be made available on the website of the Company.
  - > All Information and/or documents as mentioned in Regulation 30 of the Listing Regulations on Material Events, .
  - > All Information and/or documents provided to be filed with stock exchanges.
2. The Company shall ensure that contents of the website are correct.
3. Information and/or Documents, required to be made available on the website under Regulation 46(2) of the Listing Regulations, shall be made available on the website within two working days from the date of dissemination of information and/or documents by the Company, unless specified otherwise (refer Clause 46(3) of Listing Regulations). The Company shall update any change in the content of its website within two working days from the date of such change in content.
4. Information and/ or Documents required to be made available under Regulation 30 of the Listing Regulations shall be made available on the website simultaneously with disclosure to Stock Exchanges.
5. The information and/or documents uploaded on the website shall be available for current Financial year and for the preceding five financial years.
6. Information and/ or Documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers, viz.
  - a) The information and/or documents may be arranged financial year wise with further segregation into four quarters of the financial year.
  - b) All policies etc. or the information/ documents of a general nature can be clubbed together at one place.

### **3.2 ARCHIVAL OF DOCUMENTS MENTIONED IN CLAUSE (A) & (B) OF CLAUSE 3.1**

Documents mentioned in sub clause (A) & (B) of Clause 3.1 above shall be maintained/ preserved in the following manner:

#### **Documents maintained in physical form:**

1. All information and/or documents pertaining to current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
2. All documents pertaining to the period prior to one preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation in Annexures attached hereto. The said records be also maintained in such a manner that their retrieval is easy and quick.

#### **Documents maintained in electronic form:**

1. All documents pertaining to current Financial year and for one preceding financial year shall be maintained on server and Backup be maintained at least every week on scheduled time and day. The documents shall be maintained in such a manner that their retrieval is easy and quick.

2. Back up of all documents pertaining to the period prior to one preceding financial year shall also be maintained on server, in good condition at least up to the minimum period specified for their maintenance / preservation. The said records be also maintained in such a manner that their retrieval is easy and quick.

**Documents made available on the website of the company:**

1. After the expiry of time mentioned in Clause B (5) of this policy (i.e. five financial years preceding the current financial year), the information and/or document shall be removed from the main website. The Backup of said information and/or document which is removed from the main website shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years the backup may be permanently removed from the server.

**3.3 DESTRUCTION OF DOCUMENTS MENTIONED IN SUB CLAUSE (A) & (B) OF CLAUSE 3.1 OF THIS POLICY**

Any of the documents mentioned in sub clause (A) & (B) of clause 3.1 of this policy, which are not required to be maintained and preserved permanently shall be destroyed in the following manner:

**1) Documents maintained in physical form:**

(i) After the expiry of minimum period as mentioned in Annexure 1, 2 & 3 (or any further period decided by the company) for maintaining or preserving the document, the details of such documents shall be informed to Sh. Ramesh Chander Mahajan, Managing Director, by the person responsible to maintain the said records, for destruction.

(ii) (a) The Company Secretary (for secretarial records), and (b) CFO (for Books of Accounts) shall evaluate the need for further preservation and then give their approval for destruction if considered fit and proper.

(iii) The person responsible to maintain the said records shall arrange to destroy the said records of the Company after obtaining the approval of Managing Director.

(iv) The Company Secretary/ CFO shall maintain a Register (Register for destruction of records) for recording the details of records of the Company so destroyed. The Managing Director along with the person responsible and the person in whose presence the records are destroyed shall endorse the relevant entry in the Register for destruction of records/ documents.

**2) Documents maintained in electronic form:**

(i) After the expiry of minimum period as mentioned in Annexure 1, 2 & 3 (or any further period decided by the company) for maintaining or preserving the document, the details of such documents shall be informed to the Managing Director by the person responsible to maintain the said records for destruction.

(ii) (a) The Company Secretary (for secretarial records), and (b) CFO (for Books of Accounts) shall evaluate the need for further preservation and then give their approval for destruction if considered fit and proper.

(iii) The person responsible to maintain the said records may arrange to destroy the backup of said records of the Company from the server after obtaining the approval of Managing Director.

(iv) The Company Secretary/ CFO shall maintain a Register (Register for destruction of records) for recording the details of records of the Company so destroyed. The Managing Director along with the person responsible and the person in whose presence the records are destroyed shall endorse the relevant entry in the Register for destruction of records/ documents.

**3) Documents maintained in Archives (for documents made available on website):**

(i) After the expiry of 3 years from the time the information and/or document is transferred and is lying as backup on the server, all back up information and/or documents may be permanently removed from the server, unless otherwise required to be maintained/ preserved by applicable laws.

(ii) The person responsible to maintain the said records shall arrange to remove the said records of the Company after obtaining the approval of Managing Director.

(iii) The Company Secretary shall maintain a Register (Register for destruction of records) for recording the details of backup records of the Company so removed from the server. The Managing Director along with the person responsible and the person in whose presence the backup records are removed/ destroyed shall endorse the relevant entry in the Register for destruction of records/ documents.

**4) Additional requirement of seeking approval of the Board of Directors and/ or Central Government for destruction of records**

i. In addition to the requirements mentioned in Clause 3.3 (1) & (2) above, the Company Secretary shall also seek approval of Board of Directors of the Company and approval of Central Government, if required, for destroying the records of the Company mentioned in Annexure 4 of this policy.

ii. The Board of Directors shall appoint and authorise a person, in whose presence the records of the Company shall be destroyed.

iii. The person authorised by the Board of Directors shall in the Register of destruction of records [Register as referred in Clause 3.3 (1) (iv) above] endorse the relevant entry of the records destroyed in his presence.

**4. AMENDMENTS TO THE POLICY**

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

Documents whose preservation shall be permanent in nature

Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
1	Copies of all documents and information as originally filed under section 7(1) (incorporation) till dissolution under the Companies Act, 2013	Registered office		Sec 7(4) of the Companies Act, 2013	Permanent, till dissolution of the company
2	Register of Renewed and Duplicate Share Certificates	Registered office of the company or at such other place where the Register of Members is kept	Company Secretary/ CFO or any other person authorized by the Board for the purpose.	Rule 6 (3) of Companies (Share Capital and Debenture) Rules, 2014	Permanent
3	Share certificate forms and related books and documents – Disputed cases	Office of Registrar and Share Transfer Agent	Company Secretary/ CFO	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	Permanent
4	Register of Charges	Registered office	Company Secretary/ CFO or any other person authorized by the Board for the purpose.	Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	Permanent
5	Register of Members along with the index	Office of Registrar and Share Transfer Agent	Company Secretary/ CFO or any other person authorized by the Board for the purpose.	Rule 15(1) of the Companies (Management and Administration) Rules, 2014	Permanent
6	Foreign Register of Members	Office of Registrar and Share Transfer Agent	Company Secretary/ CFO or any other person authorized by the Board for the purpose.	Rule 15 (4) of the Companies (Management and Administration) Rules, 2014	Preserved permanently, unless it is discontinued and all the entries are transferred to any other foreign register or to the principal register

7	Minutes of proceedings of general meeting and resolutions passed by postal ballot, meeting of Board of Directors, creditors, committees of the Board and resolutions passed by Circulation.	Registered Office or at such other place as may be approved by the Board.	Company Secretary/ CFO	Rule 25(1)(d) & (e) of the Companies (Management and Administration) Rules, 2014 and Secretarial Standards 1 & 2 – clause 8.1 & 18.1	Permanent
8	Register u/s 186 of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities)	Registered Office	Company Secretary/ CFO or any other person authorized by the Board for the purpose.	Rule 12(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
9	Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person)	Registered Office	Company Secretary/ CFO	Rule 14(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
10	Register u/s 189 of the Companies Act, 2013 (Register of contracts or arrangements in which directors are interested as per section 184 & 188 of the Act)	Registered Office	Company Secretary/ CFO or any other person authorized by the Board for the purpose.	Rule 16(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Permanent
11	Minutes of all the general, Board & Committee Meetings of the transferor Company as handed over to the transferee company	Registered Office	Company Secretary/ CFO	8.1 & 18.1 (Secretarial Standards-1 & 2)	Permanent

**Documents with preservation period of not less than eight years after completion of the relevant transactions**

**A) Mandated under Companies Act, 2013**

Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
1	Register of Deposits accepted or renewed	Registered Office		Rule 14(3) of The Companies (Acceptance of Deposits) Rules, 2014	Not less than 8 years from the financial year in which the latest entry is made in the register
2	Instrument creating charge or modification thereon	Registered Office		Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	8 years from the date of satisfaction of charge by the company
3	Register of debenture holders or any other security holders along with the index	Office of Registrar and Share Transfer Agent	Company Secretary/ CFO or any other person authorized by the Board for such purpose	Rule 15 (2) of the Companies (Management and Administration) Rules, 2014	8 years from the date of redemption of debentures or securities,
4	Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto	Registered Office		Rule 15 (3) of the Companies (Management and Administration) Rules, 2014	8 years from the date of filing with the Registrar of Companies.
5	Foreign register of debenture holders or any other security holders	Office of Registrar and Share Transfer Agent	Company Secretary/ CFO or any other person authorized by the Board for such purpose	Rule 15 (4) &(5) of the Companies (Management and Administration) Rules, 2014	8 years from the date of redemption of such debentures or securities.
6	All notices for disclosure of concern/ interest received u/s 184 of the Companies Act, 2013	Registered Office	Company Secretary/ CFO or any other person authorized by the Board for such purpose	Rule 9(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	8 years from the end of the financial year to which it relates
7	The attendance register of Board & Committee Meetings	Registered Office	Company Secretary/ CFO	4.1.7 of Secretarial standards -1	8 financial years



8	Office copies of Board Meeting Notices, Agenda, Notes on Agenda and other related papers of the company as well as for transferor Company (as handed over to the transferee company)	Registered Office		8.2 of Secretarial Standards-1	As long as they remain current or for 8 financial years whichever is later
9	Office copies of general meeting Notices, scrutinizers report and other related papers of the company as well as for transferor Company (as handed over to the transferee company)	Registered Office		18.2 (Secretarial Standards-2)	As long as they remain current or for 8 financial years whichever is later
10	Any other register /documents required by any law, for the time being in force	Registered Office			8 financial years
11	All Documents of Transferor Company not mentioned elsewhere	Registered Office			8 financial years
12	Books of Accounts	Registered Office			8 financial years

**B) Illustrative list of Documents identified under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 apart from Documents mentioned in Annexure 1 & Annexure 2 (Part A)**

Sl. No.	Document	Provision	Regulation No.	Period
1	Compliance certificate (for compliance of Reg. 7(2) signed by Compliance officer & Share transfer agent.	within one month of end of each Half year	7(3)	8 financial years
2	Statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter.	within twenty one days from the end of each quarter	13(3)	8 financial years
3	quarterly compliance report on corporate governance	within fifteen days from close of the quarter.	27(2)	8 financial years
4	prior intimation to stock exchange about the meeting of the board of directors	Within the time prescribed	29	8 financial years

5	disclosures of any material events or information	Within the time prescribed	30	8 financial years
6	Statement showing holding of securities and shareholding pattern separately for each class of securities	on a quarterly basis, within 21 days from the end of each quarter	31	8 financial years
7	Statement of deviation(s) or variation(s) in the use of proceeds from the objects stated in the offer document or explanatory statement to the notice for the general meeting, for public issue, rights issue, preferential issue etc.	Within the prescribed time on a quarterly basis	32	8 financial years
8	quarterly and year-to-date standalone/ consolidated financial results	Within the prescribed time on a quarterly basis	33	8 financial years
9	as part of financial results for the half year by way of a note a statement of assets and liabilities as at the end of the half-year	along with quarterly Financial Results	33(3)(f)	8 financial years
10	annual report	within twenty one working days of it being approved and adopted in the annual general meeting	34	8 financial years
11	Annual Information Memorandum		35	8 financial years
12	a certificate from a practicing company secretary, certifying that all certificates have been issued within thirty days of the date of lodgement for transfer, subdivision, consolidation, renewal, exchange or endorsement of calls/ allotment monies.	within one month of the end of each half of the financial year	40(9)	8 financial years
13	Intimation of record date		42	8 financial years
14	details regarding the voting results of general meetings	within forty eight hours of conclusion of its General Meeting,	44	8 financial years
15	Any and all kinds of filing to Stock Exchanges, viz. Press Release, Investors Presentation, etc.	Within the time prescribed	-	8 financial years

**C) Other Documents mandated under Companies Act, 2013 for Preservation but no time period prescribed**

Sl. No.	Document	Provision of law	Period of preservation
1	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means	Rule 22 (11) of the Companies Management and Administration) Rules, 2014	8 financial years

**D) Other Documents Voluntarily preserved**

Sl. No.	Document	Provision of law	Period of preservation
1	Attendance slips for Annual/ Extraordinary General Meeting	-	8 financial years
2	Dividend Payment Records	-	8 financial years

**Documents with preservation period as mentioned in last Column of each entry**

Sl. No.	Document	Person responsible for custody	Reference of provision	Period
1	Share certificate related books and documents (other than disputed cases)	Company Secretary/ CFO or any other person authorised by the Board.	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	30 years
2	Share certificates surrendered to company immediately be defaced by stamping or printing the word "cancelled" in bold letter)	Company Secretary/ CFO or any other person authorised by the Board.	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	3 years from the date on which they were surrendered

**Destruction of records with approval of Board of Directors and/or Central Government**

Sl. No.	Document	When to be destroyed	How to be destroyed	Reference of provision
1	Share certificates surrendered to the company	may be destroyed after expiry of 3 years from the date of surrender	under the authority of a resolution of the Board of Directors and in the presence of a person duly appointed by the Board in this behalf	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014
2	The attendance register of Board & Committee Meeting	may be destroyed after eight financial years	with the approval of Board of Directors	4.1.7 of secretarial standards-1
3	Office copies of Notices, Agenda, Notes on Agenda and other related papers of the company	May be destroyed after eight financial years or as long as they remain current, whichever is later	Destroyed with the approval of Board	8.2 of secretarial standards-1
4	Office copies of Notices, Agenda, Notes on Agenda and other related papers of the transferor Company as handed over to the transferee company	May be destroyed after eight financial years	Destroyed with the approval of Board and Central Government, if applicable	8.2 of secretarial standards-1
5	Office copies of general meeting Notices, scrutinizers report and other related papers of the company	May be destroyed after eight financial years	Destroyed with the approval of Board	18.2 of secretarial standards-2
6	Office copies of general meeting Notices, scrutinizers report and other related papers of the transferor Company as handed over to the transferee company	May be destroyed after eight financial years	Destroyed with the approval of Board and Central Government, if applicable	18.2 of secretarial standards-2

