PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY

LEGAL BACKGROUND:

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires every listed entity shall have a policy for preservation of documents, classifying them into at least following two categories:

- Documents whose preservation shall be permanent in nature; and
- Documents with preservation period of not less than 8 years after completion of the relevant transactions.

Further, Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires every listed entity to disclose on its website all such events or information which has been disclosed to stock exchange(s) under this regulation (Regulation 30), and such disclosures shall be hosted on the website of the listed entity for a minimum period of 5 years and thereafter as per the Archival Policy of the listed entity, as disclosed on its website.

PRESERVATION OF DOCUMENTS:

In compliance with the provisions of Regulation 9 of the SEBI (LODR) Regulations, 2015 the board hereby defines the documents in the following two categories:

A) Documents whose preservation shall be permanent in nature:
   (i) Certificate of Incorporation of the company
   (ii) Memorandum of Association and Article of Association and any modification therein
   (iii) Register of Members, Debenture holders or any other security holders including index of the names mentioned therein
   (iv) Register of charge as per Companies Act, 2013 as amended from time to time
   (v) Register of investments as per companies Act, 2013 as amended from time to time
   (vi) Minutes of the Meetings of board and committees thereof
   (vii) Minutes of Shareholders' Meeting and Postal ballot
   (viii) Any other documents/information as per statutory requirement

B) Documents with preservation period of not less than 8 years after completion of the relevant transactions:
   (i) Instruments creating charge, modification and satisfaction thereof as per Companies Act, 2013 as amended from time to time
   (ii) Annual Returns as per Companies Act, 2013 as amended from time to time
   (iii) Register of Deposit as per Companies Act, 2013 as amended from time to time
   (iv) Annual Report including financial statements, Directors' Report and Auditors Report on financial statements
   (v) Declaration of beneficial owner received by the stakeholders
   (vi) Any other documents or information as may be prescribed under any applicable law

Apart from the above said documents/information shall be preserved as per the period of preservation mentioned in the respective statute as may be applicable on the company.

MODE OF PRESERVATION:

The documents/information may be preserved in physical and/or electronic mode as per the need of hour.

Electronic mode *means and includes preservation of documents/information in an electronic device/format such as computer, laptop, compact disc, floppy disc, cloud storage or any other form of storage and retrieval device, considered feasible, whether in control or possession of the company.*

ARCHIVAL POLICY:

Pursuant to the provisions of Regulation 30(8) of SEBI (LODR) Regulations, 2015 the company shall disclose on its website all such events or information which are required to be disclosed to the stock exchanges under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with Schedule III thereof.

The disclosures made to the stock exchanges shall be hosted on the Company’s website for a period of 5 years from the date of initial posting. After that such disclosures shall be preserved in the archival folder in a way so that these can be searched easily as and when required by any person. The documents/Disclosures shall be kept in the archive folder till such time as may be required by law.

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