



## **POLICY ON PRESERVATION OF DOCUMENTS & ARCHIVAL OF DOCUMENTS IN THE WEBSITE**

### **PREAMBLE:**

In compliance with Regulation 9 and 30 (8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), the Board of Directors (“Board”) of Pratibha Industries Limited (“Company”) has approved the following Policy for Preservation of Documents & Archival of Documents in the website (“Policy”) for the Company.

The Policy shall be applicable on preservation of documents / records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “Documents”).

### **PURPOSE OF THE POLICY:**

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

### **SCOPE:**

This policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

### **DEFINITIONS:**

- a) “Act” means the Companies Act, 2013, including any amendment or modification thereof.
- b) “Board” means Board of Directors of the Company.
- c) “Company” means Pratibha Industries Limited.
- d) “Document” means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the



Companies Act 2013, SEBI Act, 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.

- e) "Regulations" shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
- f) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

➤ **POLICY ON PRESERVATION OF DOCUMENTS:**

**a. CREATION OF DOCUMENTS:**

All employees of the Company are required to create accurate documents regarding their respective matters. The documents should:

- i. facilitate necessary action by employees and their successors at any level at all points of time;
- ii. facilitate proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;
- iii. protect the financial, legal and other rights of the organization, its clients and any other people affected by its actions and decisions.

**b. MAINTENANCE OF DOCUMENTS:**

Every member of the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transactions and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed time limit.

- Electronic documents can be maintained in forms such as emails, web pages or database records, plus scanned versions of papers that have been digitized in business processes.
- Physical documents to be maintained in books and files.

**c. DISPOSAL AND DESTRUCTION OF DOCUMENTS**

All documents mentioned in **Category - A** need to be permanently preserved by the Company during its entire life time.



All documents mentioned in **Category - B** which is temporary in nature must be preserved for a period not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed.

The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by employees who are disposing the Documents in the format prescribed at **Annexure -I**.

➤ **POLICY ON ARCHIVAL OF DOCUMENTS IN THE WEBSITE**

The Company shall disclose on its website all events or information which has been disclosed to stock exchanges (s) under Regulation 30 of Regulations. Such disclosure shall be retained on the website of the Company for a minimum period of five years. At the end of the fifth year the information shall be archived and preserved for a further period of three years.

**REVIEW**

The Policy shall be subject to review of the Board and may be amended as may be deemed necessary and/or in accordance with any regulatory amendments.



### CATEGORY "A" DOCUMENTS

Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time;

<b>Item No.</b>	<b>Records/ Documents</b>
1.	Certificate of incorporation
2.	Certificate for commencement of business
3.	Memorandum and Articles of Association
4.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
5.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
6.	Register and Index of Members, debenture-holders, if any or other security holders, if any
7.	Register of Contracts as per Companies Act, 2013
8.	Register of Charges as per Companies Act, 2013
9.	Register of Inter Corporate Loans and Investments as per the Companies Act, 2013
10.	Register of Directors and Key Managerial Personnel and its share holding
11.	Register of disposal of records
12.	Register of documents executed under Common Seal of the Company
13.	Registers of Investments in securities not held in the name of the Company
14.	Register of Transfer/ Transmission of shares and issued of duplicate share certificates
15.	Such other records as may be required under any law from time to time



### CATEGORY "B" DOCUMENTS

Other Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions the subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Item No.	Records/ Documents
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Annual Returns as per Companies Act, 2013
3.	Register of Deposits as per Companies Act, 2013
4.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
5.	Annual financial statements including Annual accounts, Directors report, -Auditors report
6.	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
7.	Income Tax Returns filed under Income Tax Act, 1961
8.	All notices in form MBP – 1 received from Directors and KMPs alongwith any amendment thereto
9.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
10.	Copy of newspaper advertisement or publications
11.	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases.
12.	Compliance Reports received from any statutory authority
13.	Correspondences made with any statutory authority
14.	Register of Power of attorneys, if any
15.	Forms and returns filed with RBI/MCA or with any other statutory authority



**ANNEXURE – I**

**REGISTER OF DOCUMENTS/ RECORDS DISPOSED OFF/ DESTROYED**

<b>Date</b>	<b>Mode of Destruction</b>	<b>Particulars of Documents</b>	<b>Signature of Authorized Person</b>