



AHIMSA INDUSTRIES LIMITED

CIN: L25200GJ1996PLC028679

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POLICY ON PRESERVATION OF DOCUMENTS

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1. PREAMBLE:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Regulations"] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

2. SCOPE:

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. PURPOSE OF THE POLICY

The purpose of this policy is to establish the framework needed for effective management of the Records at the Company and also set principles for underlying the Company's approach to preservation of its Records. In order to efficiently conduct its business, the storage, retrieval and management of these information reserves of the Company is a significant issue.

A good record keeping program is fundamental to the Company's commitment to administrative transparency and accountability. It enables the Company to account for decisions and actions by providing essential evidence in the form of Records and ensures the preservation of the collective memory of the Company.

The Company is concerned with all aspects of its record keeping independent of the technological medium. This policy seeks to ensure that the Company's business is adequately documented through the creation of Records that are then managed in accordance with best practice.

Preservation of Records is the responsibility of all staff & users of archives and Records of the Company. Responsibility is to ensure the continuous availability and authenticity of the Records.

4. DEFINITIONS:

"Act" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

"Board of Directors" or **"Board"** means the collective body of the Directors of the Company.

"Company", "This Company", "The Company", wherever occur in the policy shall mean **"Ahimsa Industries Limited"**.

"Current" means running matter or whatever is at present in course of passage.

"Electronic Form" means any contemporaneous electronic device such as computer, laptop, compact disc, Floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

“Maintenance” means keeping documents, either physically or in electronic form.

“Policy” or **“This Policy”** means, “Policy on Preservation of Documents”.

“Preservation” is maintenance of documents, files and Records in usable form.

“Register” means a register maintained under the Companies Act, 2013 or the SEBI Act.

“Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

5. INTERPRETATION:

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and / or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

6. GUIDELINES:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the 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.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. Documents that need to be preserved and retained permanently;
- b. Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;
- c. Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- d. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”.

An indicative list of the documents and the time-frame of their preservation is provided in **Annexure – A**.

7. MODES OF PRESERVATION:

The Documents may be preserved in

- a. Physical form; or
- b. Electronic Form

The official of the Company who is required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and to prohibit unauthorized access.

- **Destruction of documents:**

All Records mentioned in Annexure A which are temporary in nature must be preserved for 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. However, all Records mentioned in Annexure A as Permanent Preservation need to be preserved by the Company permanently during the entire life of the Company. Utmost care is to be taken to ensure that files are neither prematurely destroyed nor kept for period longer than necessary.

Notwithstanding the general guidelines specified in Annexure A, care should be taken by the respective departments to ensure that Records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi- judicial, mediation and alternate dispute fora etc. are preserved according to specific needs and even beyond the prescribed period. Also, in the case of statutory Records such as licenses, certificates, sanctions, approvals, etc.

The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Secretary or such other person as may be authorized by the Board for the purpose. Inspection of this register is restricted.

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents, required to be preserved for long periods or permanently, the same should be preserved in fire proof or secure cabinets.

8. POLICY REVIEW:

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

9. AMENDMENT

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.

ANNEXURE – A

Indicative List

A. PERMANENT PRESERVATION:

- a. Certificate of incorporation
- b. Certificate of change of name (if any)
- c. Memorandum and Articles of Association as amended from time to time
- d. Statutory registers maintained under the Companies Act, 2013
- e. Minutes books of Board, General Meetings and Committee Meetings,
- f. License and Permissions,
- g. Statutory Forms and disclosures except for routine compliance,
- h. Scrutinizers' Report,
- i. Register of Members
- j. Any other Records/documents which will have a permanent value for the Company event after the expiry of legal preservation period

B. TEMPORARY PRESERVATION UPTO 8 YEARS:

- a. Annual Reports
- b. Annual Returns,
- c. Board Agenda and supporting documents,
- d. Attendance Register,
- e. Office copies of Notice of General Meeting and related papers,
- f. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers,
- g. All notices pertaining to disclosure of interest of directors,
- h. NSDL/CDSL Files
- i. Instrument creating a charge or modification,
- j. Books of accounts, financial statements etc. and
- k. Register of debenture holders or any other security holders.
- l. Declaration by directors under section 164 of the Companies Act, 2013
- m. Declaration by directors under section 184 of the Companies Act, 2013
- n. All documents under the Listing Agreement

C. OTHERS: As per applicable law.