



Policy on Preservation & Archival of Documents



Dhabriya Polywood Limited
(formerly known as Dhabriya Agglomerates Limited)
B-9D(1), Malviya Industrial Area, Jaipur - 302017

POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS

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

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. DEFINITIONS

In this Policy, unless the context requires otherwise:-

- a) "Act" means the Companies Act, 2013 and the Rules framed thereunder, including any modifications, amendments, clarifications, circulars or re-enactment thereof.
- b) "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.
- c) "Maintenance" means keeping Documents, either physically or in Electronic Form.
- d) "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.

- e) “Regulations” shall mean SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015, including any modifications, amendments, clarifications, circulars or re-enactment thereof.

Any other term not defined herein shall have the same meaning as defined under the Companies Act, 2013, the Listing Agreement, Regulations or any other applicable law or regulation to the extent applicable to the Company.

4. ADMINISTRATION

Attached as Appendix A is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode too. The Managing Director, Chief Financial Officer, Compliance Officer, Head of the Departments who are responsible for relevant areas of the Company’s operation (Responsible Officer) shall be in- charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

5. MANNER OF PUBLIC DISCLOSURE OF RECORDS PUBLISHED ON THE WEBSITE OF THE COMPANY

The documents required to be published on the website of the Company shall be hosted under the “Investors” section of the website till 5 (Five) years from its disclosure on the website of the Company i.e. www.polywood.org.

Thereafter, the same shall be transferred to the “Past Information/Events” section till such time as may be instructed by the Directors of the Company or the Company Secretary. However, in case of any updation in disclosure of such published record, the older record can be removed from the website of the Company as per the will of the Directors of the Company or the Company Secretary, provided it does not lead to contravention of any law(s) or regulation(s) in force.

6. PROCEDURE FOR DISPOSAL OF DOCUMENTS

The Documents that are no longer required as per the time schedule prescribed in the Appendix A may be destroyed. The Responsible Officers may direct the relevant employees from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Appendix A. 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 Appendix B.

7. EFFECTIVE DATE

The Policy as approved by the Board of Directors shall be effective from December 1, 2015.

8. Monitoring and Review

This Policy will be regularly monitored and reviewed to ensure that it remains relevant to the Company's business aims and requirements. Compliance with this Policy and associated procedures will be monitored on an ongoing basis through self-assessment procedures and reviews. The continuous monitoring ensures that

- No illegal records disposal takes place.
- There is a timely review of procedures to ensure that they, the procedures, are relevant, useful and meet the statutory needs.
- Unauthorized access to records is averted.

9. AMENDMENTS TO THE POLICY

The board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the policy entirely with the new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

Annexure 'A'

Documents Preservation Schedule :

A. Corporate Records

Sr. No.	Document Type	Preservation Period (In Years)
1.	Common Seal, Certificate of incorporation, Certificate of change of name (if any), Memorandum and Articles of Association as amended from time to time, Counter folios of Share Certificates issued from time to time	Permanent
2.	Annual Report, Director's Report, Auditor Report, Secretarial Report and such other report as required	Permanent
3.	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
4.	Statutory Registers	Permanent
5.	License and Permissions under various Laws	Permanent
6.	Statutory Forms except for routine compliance	Permanent
7.	All documents required under Listing Agreement	Permanent
8.	Register of Members & Index of Members	Permanent
9.	Vat/ Sales Tax Records, TDS Records, Income tax Papers, Books of accounts	8
10.	Annual Returns	8
11.	Board Agenda and supporting documents	8
12.	Attendance Register of meeting of BOD	8
13.	Office copies of Notice of General Meeting and related papers	8
14.	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8
15.	Register & Index of Debenture-holders, If any	15 years after the redemption of debentures

B: All other documents

All other documents of the Company shall be maintained in compliance with the requirements of the applicable laws.

Annexure 'B'

Sr. No.	Particulars of documents destroyed	Date and mode of destruction with the initials of the Responsible Officer