

Ayeppee Lamitubes Limited

Policy on preservation of documents and archival policy

1. INTRODUCTION

Securities and Exchange Board of India has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 vide notification dated 2 September 2015 coming into effect from 1 December 2015. The said Regulation is in substitute of compliance requirement of listing agreements entered into with recognized Stock Exchanges in India in respect to listing of equity shares, debts and other securities. Said Regulation *inter alia* provides for preservation of documents by classifying them in atleast 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.

The Regulation also provides that the documents may be kept in electronic mode by a listed entity.

2. PURPOSE

The purpose of this policy is to determine the period for preservation of documents based on their relevance and legal requirements in compliance with the SEBI Regulations and applicable law.

The following aspects are to be considered while determining the preservation period.

- a) Statutory requirements under the applicable laws and regulations.
- b) Easy retrieval of documents.

3. TITLE, COMMENCEMENT AND EXTENT

3.1 This Policy is called “Policy on preservation of documents” or the “Policy” and also includes archival policy.

3.2 This Policy shall come into force from 1 December 2015.

This Policy has been approved by the Board and the same shall come into effect from 1 December 2015. This policy shall be applicable to documents prospectively coming into effect from effective date.

4. DEFINITIONS AND INTERPRETATION

In this Policy, except where the context otherwise requires, the following words and expressions shall have the following meaning:

- 4.1 “**Act**” means the Companies Act, 2013, and rules made there under, as amended from time to time.
- 4.2 “**Board**” or “**Board of Directors**” means the Board of Directors of the Company and also includes for the purpose of this Policy, any committee of directors and/or executives, as may be constituted by the Board.
- 4.3 “**Company**” means **Ayeppee Lamitubes Limited**, registered in India under the Companies Act 1956/2013.
- 4.4 “**Document**” includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained in paper or in electronic form.
- 4.5 “**Electronic Form**” with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.
- 4.7 “**Regulation**” or “**Listing Regulation**” means the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended or re-enacted from time to time.

5. CLASSIFICATION OF DOCUMENTS

The documents to be preserved by the Company shall be classified into following two categories.

- a) Documents to be preserved permanently
- b) Documents to be preserved for not less than eight years

The above mentioned documents can also be preserved in electronic mode.

6. PRESERVATION PERIOD

For determining the preservation period, the documents are categorized into following categories.

Sr.	Category of documents	Period Preservation
a	Documents to be preserved permanently includes documents having permanent value for the Company and documents needs to be preserved permanently as	Permanent (Annexure 1)

	per applicable law, statutory directions etc.	
b	Documents which are not required to be preserved permanently as mentioned above.	8 years or as may be decided

The list of Documents included in Annexure 1 is illustrative in nature. The actual preservation period may vary as per the business and the Company's operation, practices, exigencies and legal requirements.

It needs to preserve documents from preparation, generation, receipt of documents etc. however for the purpose of calculation of years under this Policy, period starts with the conclusion of the financial year in which the document has been prepared or last entry was made or last signing, whichever is later and the preservation period of agreements start with the end of the financial year in which the period of agreement expires.

Notwithstanding the general guidelines, care should be taken that documents of special nature such as unsatisfied claims by or against the Company, suits pending in courts, disputes, etc. are preserved according to specific needs even beyond the prescribed period.

7. MODE OF PRESERVATION

Documents may be preserved either physically or in electronic form.

8. DESTRUCTION OF DOCUMENTS

8.1 The Documents preserved shall be reviewed periodically as may be appropriate and a list shall be prepared of documents which become due for disposal. The List shall be placed before the Board and after approval, the Documents shall be destroyed as per directions, manner and in presence of person as may be decided by the Board.

8.3 If the organization is involved or is reasonably anticipated to be involved in any litigation, audit or similar activity by statutory or regulatory bodies, then destruction of documents may be kept on hold temporarily.

9. POWER OF THE BOARD

Notwithstanding anything contained in this Policy, the Board may decide to preserve Documents for lesser or higher period, subject to mandatory provision under the Act and/or other applicable law or statutory guidelines or directions.

10. ARCHIVAL POLICY

In accordance with regulation 30 of the Regulations, information, details etc would be posted on the website of the Company and retained for five years and thereafter the information shall be removed from the website as may be determined by the Board or Manager or any KMP.

11. REVIEW OF POLICY

The Policy may be reviewed as the necessity may arise and the Board or Manger or any KMP to decide about appropriate changes as may be necessary or as warranted by law.

12. CLARIFICATIONS, AMENDMENT ETC

12.1 This Policy has been framed in compliance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. In case of any amendment in the Regulations, direction or clarification by SEBI, provisions of this Policy shall be read and implemented in context of such amended or clarified positions.

12.2 This Policy may be modified, amended or substituted by the Board as may be necessary.

12.3 This Policy is approved by the Board of Directors.

ANNEXURE I
Documents to be preserved permanently

Unless otherwise stated the following documents shall be preserved permanently:

1. Documents, registers, forms, information etc under the Companies Act 1956 / Companies Act 2013

- a) Registers maintained under the Companies Act 2013.
- b) Minutes of meetings of Board of Directors, its Committees and shareholders
- c) Documents relating to change in constitution of the Company, mergers and amalgamations etc.
- d) Various forms and returns filed with Registrar of the Companies
- e) Annual Reports

2. Documents, filings etc relating to Stock Exchanges and SEBI

Documents, filings, papers, compliances etc filed with Stock Exchanges and/or SEBI and paper relating thereto.

3. Statutory approvals, license etc.

Statutory approvals, permissions, license, renewals etc which are material in nature relating to the Company and its business.