

Mohite Industries Limited
Policy for Preservation of Documents

Introduction –

The Securities and Exchange Board of India ((Listing Obligations and Disclosure Requirements) Regulations, 2015 requires that the Company to frame a Policy for Preservation of Documents classifying them into two categories:

- i. Documents whose preservation shall be permanent in nature; and
- ii. Documents to be preserved for not less than eight years.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognise that all the documents, whether in physical or electronic mode, form an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

Objectives –

The preservation Policy of documents aims to ensure-

1. Preservation of the existing/future documents permanently or for specified period/s.
2. Destruction of document/s after the period of preservation.
3. Documents shall cover those in physical mode as well as in electronic mode.
4. A systematic approach to maintenance and availability of documents in the records of a company as per the requirements of the applicable laws and elimination of documents which have outlived their utility.

Scope -

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

Definitions:

- a. "Act" means the Companies Act, 2013.
- b. "Applicable Law" means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA) , The Institute of Company Secretaries of India (ICSI) and other professional bodies under which the preservation of documents has been prescribed.
- c. "Board" means the Board of the Directors of the Company.
- d. "Books of Accounts" includes records maintained in respect of –

- i. all sums of money received and expended by the Company and matters in relation to which the receipts and expenditure take place
- ii. All sales and purchases of goods and services by the Company
- iii. The assets and liabilities of the Company; and
- iv. The items of cost as may be prescribed under section 148 of the Act in case the Company belongs to any class of companies specified under that section.
- e. "Company" means Mohite Industries Limited.
- f. "Documents" refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form.
- g. "Electronic Form" means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, 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.
- h. "Maintenance" means keeping documents, either physically or in Electronic Form.
- i. "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- j. "SEBI LODR" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

Preservation Of Documents

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time-to-time.

Documents to be preserved permanently:

- Memorandum and Articles of Association as amended from time to time.
- Register of Contracts with related party and contracts and Bodies etc. in which directors are interested.
- Register of Directors and KMPs.
- Register of Loans and Investments made by the Company.
- Register and Index of Members.
- Minutes of the Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots.
- Register of Charges
- Registers of Renewed and duplicate share certificates

Documents which are to be maintained for at least eight financial years:

- a. Books of account together with the vouchers relevant to any entry in such books of account
- b. Copies of all Annual Returns
- c. Disclosure of Interest received from the Directors of the Company in the manner prescribed
- e. Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings
- f. Instrument creating a Charge or modifying a Charge, if any

- g. Register of deposits accepted or renewed, if any
- i. Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for Appeal, as the case may be.
- j. Employment /Personnel Record in case of employees of the Company
- k. All reports filed with the stock exchanges from time to time

Mode Of Maintenance

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to.

All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

Disposal And Destruction Of Records

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/ unimportant/irrelevant.

Amendments –

The policy is subject to review as may be necessary and in accordance with any statutory /regulatory requirements

Adopted by the Board of Directors of Mohite industries Limited