

POLICY ON PRESERVATION OF DOCUMENTS

1. LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 and Regulation 30 being to formulate and put in place a policy for preservation of documents.

The Board of Directors of Kothari Products Limited (“the Company”) is required to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

2. DEFINITIONS

A. “Board of Directors” or “Board”

Board of Directors or Board shall mean the Board of Directors of Kothari Products Limited, as constituted from time to time.

B. “Company”

Company shall mean “**Kothari Products Limited**”

C. “Documents”

Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices and the like as required to be maintained under any law or regulation for the time being in force.

D. “Listing Regulations”

Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

3. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- A The documents of a permanent nature listed in “**Annexure 1**” shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions listed in “Annexure-2” shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

5. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

6. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents.

7. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all Employees and Directors, a copy of this policy shall be posted on the intranet and the website of the Company.

8. AMENDMENTS

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 this policy entirely with a 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

Records to be preserved permanently

S.No.	Records
1.	Certificate of incorporation, commencement, if applicable.
2.	Memorandum and Articles of Association.
3.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013.
4.	Register and Index of Members, debenture-holders, if any or other security holders, if any.
5.	Register of Contracts as per Companies Act, 2013.
6.	Register of Charges as per Companies Act, 2013.
7.	Register of Investments as per Companies Act, 2013.
8.	Files relating to properties viz. Title Deeds/Lease Deeds of owned premises / land and building, etc. where ever applicable.
9.	Certificates obtained from various statutory authorities, where ever applicable.
10.	Any other document as may be required to maintained permanently in terms of applicable law(s).

ANNEXURE-B

Records to be preserved for minimum period of eight years

S.No.	Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013.
2.	Register of Inter Corporate Loans and Investments as per the Companies Act, 2013.
3.	Annual Returns as per Companies Act, 2013.
4.	Register of Deposits as per Companies Act, 2013, if applicable.
5.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013.
6.	Annual Financial Statements including: - Annual Accounts - Directors Report - Auditors Report
7.	Vouchers / Voucher register and books of accounts as defined under Sub-Section 13 of Section 2 of the Companies Act, 2013.
8.	Income Tax Returns filed under Income Tax Act, 1961.
9.	All notices in form MBP-1 received from Directors alongwith any amendment thereto.
10.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013.
11.	Any other document as may be required to be preserved in terms of applicable law(s).