

## **PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY**

### **I. INTRODUCTION**

The policy is prepared in accordance with the requirements of the provisions of Regulation 9 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 (“the SEBI Listing Regulations”).

This policy has been adopted by the Company's Board of Directors in order to set forth the guidelines for Preservation of documents.

Further, Regulation 30(8) of the SEBI Listing Regulations requires the company to frame a policy and host it on the website for disclosure and archival of such disclosures.

### **II. OBJECTIVE**

This policy sets the standard for classifying, managing and storing of records of the Company. The purpose of this policy is to establish a framework for effective record management and the process of subsequent archival of such records.

### **III. DEFINITIONS**

**“Applicable Law”** means any law, rules, regulations, circulars, guidelines or standards under which the preservation or archival of the documents has been prescribed.

**“Archive/archiving”** is the process of transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information. Archiving serves two main functions: conserving evidence in case of a legal claim or audit, and preserving the historical memory and proof of an activity.

**“Board”** in relation to the company, means the collective body of the directors of the company.

**“Company”** means Lahoti Overseas Limited.

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

**“Electronic Form”** means any electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the company or otherwise accessible to the Company.

**“Listing Regulations”** mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars and re-enactment thereof.

**“Maintenance”** means keeping documents, either physically or in electronic mode as may be permitted under Act/Regulations for the time being in force including authentication and custody of such documents.

**“Preservation”** means to keep in good order, to prevent from being damaged or destroyed.

**“Policy”** means this policy on preservation of documents and Archival Policy and as may be amended from time to time.

#### **IV. TYPE OF DOCUMENTS AND DUARTION OF PRESERVATION**

The Documents to be preserved are categorized in three categories as follows:

1. The documents of a permanent nature (as per Annexure I) 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.
2. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (as per Annexure II) shall be preserved by the Company for a 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.

Notwithstanding the above, in case any such documents are required to be preserved in accordance with the directions of the court or if the matter is sub-judice then the concerned documents shall be preserved until such time the matter is conclusively disposed-off.

#### **V. PRESERVATION PRINCIPLES**

The company shall primarily utilize any of the combination in preserving the records as the departmental head may deem fit.

## **VI. 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.

## **VII. WEB ARCHIVAL POLICY**

The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s).

Such disclosure shall be retained on the website of the company for minimum period of five years. Thereafter the information shall be archived and preserved for a further period of three years.

## **VIII. DESTRUCTION OF DOCUMENTS**

The Documents may be destroyed after expiration of the statutory retention mentioned above in such mode under any instructions approved by the department head(s).

## **IX. AMENDMENTS IN POLICY**

Any subsequent amendment/modification in the listing regulations and/or other applicable laws in this regard shall automatically apply to this policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.



**Annexure I**

<b>Sr No.</b>	<b>Nature of Documents</b>
1	Memorandum of Association & Article of Associations
2	Minutes of Board Meeting, Committee Meetings, General Meeting along with the necessary papers
3	Register of Members along with index, foreign register of members
4	Register of Loan, Register of Investment as per form MBP-2, Register of Contract and arrangement as per form MBP-4, Register of Charges, Register of Director and KMP
5	Statutory Reports and records
6	Certificates, approvals and license under applicable laws
7	Policies and Code of Conduct under various applicable laws
8	Financial Statements of the company
9	Correspondences with various statutory bodies
10	Material Contracts or Agreements
11	Order issued by Courts/Statutory bodies
12	Any other documents as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

**Annexure II**

<b>Sr No.</b>	<b>Nature of Documents</b>
1	Books of Accounts
2	Copies of all annual returns along with certificates & documents required to be annexed thereto
3	Register of Debenture holder, Foreign register of Debenture holder & other security holder along with index, if any
4	Books and papers of amalgamated companies
5	Notice of disclosure of interest by directors as per form MBP-1
6	Maintenance of Register of Deposits
7	Correspondences with Shareholders
8	Tax related records and documents