

PEARL POLYMERS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

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PREAMBLE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as "Regulations"] requires every Listed Company to have a policy on Preservation of Documents which has to be approved by the Board of Directors.

In this context, the following Policy has been framed by the Board of Directors ("Board") of Pearl Polymers Limited at its meeting held on 9th February, 2016 with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation.

This Policy can be modified and or amended with the approval of the Board of Directors only.

PURPOSE OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

EFFECTIVE DATE

The policy as approved by the Board of Directors shall be effective with effect from 10th February, 2016.

DEFINITIONS

- a) "Act" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.
- b) "Board of Directors" means the collective body of the Directors of the Company.
- c) "Company" wherever occur in the policy shall mean "Pearl Polymers Limited".
- d) "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.
- e) "Maintenance" means keeping documents, either physically or in electronic form.
- f) "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- g) "Regulations" means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

Note: Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013 & Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

PRESERVATION OF DOCUMENTS

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the 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 that needs to be preserved and retained permanently;
- b) Documents that need to be preserved and retained for a period of 8 years;

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.

MODE OF PRESERVATION

The Documents may be preserved in

- a) Physical form; or
- b) Electronic Form.

The official of the Company required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

PROCEDURE FOR DISPOSAL OF DOCUMENTS

The Documents of the Company which are no longer required as per the Preservation Schedule may be destroyed. The Administrator may direct Employees in charge from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records. The entries in the register shall be authenticated by the Authorised Person.

AMENDMENT

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

DOCUMENTS PRESERVATION SCHEDULE

LIST OF DOCUMENTS WHICH ARE TO MAINTAINED PERMANENTLY

S. NO.	TYPE OF DOCUMENT	PRESERVATION PERIOD	CONCERNED DEPARTMENT
1.	The Original Signed and Stamped Memorandum of Association and the Articles of Association of the Company.	Permanent	Secretarial Department
2.	Minutes of General Meetings, Board Meetings and various Committee Meetings.	Permanent	
3.	Register of Members along with Index (MGT-1).	Permanent	
4.	Foreign Register of Members, if any.	Permanent	
5.	Register of Loans, Guarantee, Security and acquisition made by the Company (MBP-2).	Permanent	
6.	Register of Investments not held in its own name by the Company, if any (MBP-3).	Permanent	
7.	Register of contracts with related party and contracts and Bodies etc. in which directors are interested (MBP-4).	Permanent	
8.	Register of contracts or arrangements in which Directors are interested (MBP-4).	Permanent	
9.	Register of Charges (CHG-7).	Permanent	
10.	Registers of Renewed and Duplicate Share Certificates (SH-2).	Permanent	
11.	Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently.	Permanent	Secretarial & Legal Department

DOCUMENTS WHICH ARE TO BE MAINTAINED FOR AT LEAST EIGHT FINANCIAL YEARS

S. NO.	TYPE OF DOCUMENT	PRESERVATION PERIOD	CONCERNED DEPARTMENT
1.	Books of account together with the vouchers relevant to any entry in such Books of Account.	8 Years	Accounts Department
2.	Register of Debenture holders (including Foreign Register of Debentures) or Register for any other Securities issued by the Company.		Secretarial Department
3.	Annual Returns and its Annexures.		
4.	Disclosure of Interest received from the Directors of the Company in the manner prescribed.		
5.	Attendance Register of Board and Its Committee Meetings.		
6.	Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings.		
7.	Instrument creating a Charge or modifying a Charge, if any.	8 Years from the date of Satisfaction of Charge	
8.	Changes to the Memorandum of Association and the Articles of Association, if any.		
9.	Register of Deposits accepted or renewed, if any.		
10.	Press Releases		
11.	<u>Tax Records</u> : 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.		
12.	Employment /Personnel Record in case of employees of the Company Relevant marketing and sales documents.		HR Department
13.	Legal documents including but not limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters.		Legal & Secretarial Department

ARCHIVAL OF DOCUMENTS

Documents mentioned in the Preservation Schedule which are not required regularly can be archived by the concerned department in the following manner:

- a) Documents to be archived should be kept in the storage locations earmarked by the Company for the purpose in secured place or cupboard having access only by the authorised personnel.
- b) Documents should be boxed and the box should be labelled with the reference number and list of the files/documents. List of documents contained in the box should be kept inside the Box and shall also be kept by the concerned department.
- c) Documents should be stored in a way that preserves their integrity and readability and restricts access to authorized personnel only.
- d) The medium used to store documents shall be such that those documents remain complete and legible throughout the required period of retention and can be made available to the Auditors or Regulatory Authorities upon request.
- e) The concerned department head should maintain a record of documents archived, box reference number and storage location; and
- f) Electronic records i.e. e-mails, files etc. should be archived as per IT Policy of the Company.