

# **VISHWAS REFOILS & CONSUMER LIMITED**

**CIN: U10403GJ2023PLC139329**

## **POLICY ON PRESERVATION OF DOCUMENTS**

(Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015(“Regulations”))

**Registered Office:** Plot No. 12 & 13, Survey No. 112/1, Ruda Transport Nagar, Anandpar, Navagam Behind Saat Hanuman Temple, Ahmedabad Highway, Rajkot-360003, Gujarat (India)

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## 1. Scope:

A policy on preservation of documents (defined below) would ensure safe keeping of the records and safeguard the documents from getting mishandled, while at the same time avoiding superfluous inventory of documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”), on preservation of the documents to aid the employees in handling the documents efficiently. It not only covers the various aspects on preservation of the documents, but also the safe disposal/destruction of the documents.

## 2. Definitions:

- i) **“Act”** means the companies Act. 2013
- ii) **“Applicable Law”** means any law, rules, circular, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate affairs and The Institute of Company secretaries of India under which the preservation of the documents has been prescribed.
- iii) **“Authorized Person”** means any person duly authorized by the board.
- iv) **“Board”** means the Board of directors of the company or its committee.
- v) **“Company”** means Vishwas Refoils & Consumer Limited.
- vi) **“Current Document(s)”** means any document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like manner.

- vii) **“Document(s)”** refers to papers , notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and 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 and does not include multiple or identical copies.
- viii) **“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.
- ix) **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- x) **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
- xi) **“Regulation”** means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015  
The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

### 3. Coverage:

This policy is intended to guide the employees of the organization on the maintenance of any Document, their preservation and disposal.

#### **4. Classification:**

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 - 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.

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-II) 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.

### **Hosting on Company Website:**

The Company shall disclose on its website all such events or information which has been disclosed to the concerned Stock Exchanges and such disclosures shall be hosted on the website of the company for a minimum period of 5 years and thereafter as per the archival policy of the company.

### **5. Modes of preservation:**

- The Documents may be preserved in
  - (i) Physical form or
  - (ii) Electronic Form.
- The employee of the Company required to preserve the Document shall be Authorized Person who is generally expected to observe the compliance of requirements of 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 Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

### **6. Custody of the documents:**

Subject to the Applicable Law, the custody of the documents shall be with the Authorized Person. Where the Authorized Person tenders resignation or is transferred from one location to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, other storage devices or such other Documents and devices

in his possession under the Policy. The Board may authorize such other person as it may deem fit as the Authorized Person.

#### **7. Authority to Board:**

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted via the Regulations.

#### **8. Authority to make alterations to the Policy:**

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

#### **9. Destruction of Documents:**

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents.

The temporary documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of documents may be destroyed as normal administrative practices are listed in Annexure - III.

A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.

The entries in the register shall be authenticated by the Authorised Person

The format of the register shall be in accordance with Annexure-IV.

#### **10. Conversion of the form in which the Documents are preserved**

- The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
- This will be done after obtaining prior approval of the Board.

#### **11. Authenticity:**

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

#### **12. Interpretation:**

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.



### **Annexure I**

Records to be preserved permanently:

<b>Sr. No.</b>	<b>Records</b>
01	Certificate of incorporation
02	Certificate for commencement of business
03	Memorandum and Articles of Association
04	Agreements made by the Company with Stock Exchanges, Depositories, etc.
05	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
06	Register and Index of Members
07	Register of Contracts as per Companies Act, 2013
08	Register of Charges as per Companies Act, 2013
09	Register of Investments as per Companies Act, 2013
10	Files relating to premises viz. Title Deeds/ Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
11	Authorization / licenses obtained from any statutory authority
12	Policies of the Company framed under various regulations
13	Register of disposal of records
14	Certificates obtained from various statutory authorities
15	Such other records as may be required under any law from time to time
16	Register of Inter Corporate Loans and Investments as per section 186 of the Companies Act, 2013.

## **Annexure II**

Records to be preserved for minimum period of eight years:

<b>Sr. No.</b>	<b>Records</b>
01	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
02	Register of Debenture Holders or any other security holders along with the index from the date of redemption of debentures or securities.
03	Annual Returns as per Companies Act, 2013
04	Register of Deposits as per Companies Act, 2013
05	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
06	Annual financial statements including: Annual accounts Directors report - Auditors report
07	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
08	Income Tax Returns filed under Income Tax Act, 1961
09	All notices in form MBP — 1 received from Directors and KMPs along with any amendment thereto
10	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
11	Copy of newspaper advertisement or publications
12	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/

	Labour Court Cases/ Arbitration Cases.
13	Compliance Reports received from any statutory authority
14	Correspondences made with any statutory authority
15	Register of Power of attorneys, if any
16	Forms and returns filed with RBI/MCA or with any other statutory authority

### **Annexure III**

The following categories of Documents may be destroyed as normal administrative practice:

1. Catalogues;
2. Copies of press cuttings, press statements or publicity material; letters of appreciation or sympathy, or anonymous letters;
3. Requests for copies of maps, plans, charts, advertising material (subject to Clause 9 and 10 of this Policy);
4. Facsimiles where a photocopy has been made; telephone message;
5. Drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 9 and 10 of this Policy); and
6. Routine statistical and progress reports compiled and duplicated in other reports (subject to Clause 9 and 10 of this Policy)

### **Annexure IV**

The format of the register of Documents disposed/destroyed:

Particulars of Document along with provision of Applicable Law	Date and Mode of Destruction	Initials of Authorized Person