

OCEANAA BIOTEK INDUSTRIES LIMITED
POLICY FOR PRESERVATION OF DOCUMENTS

AND

ARCHIVAL POLICY

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements)
Regulations, 2015

CIN: L15549TN2005PLC057919

OCEANAA BIOTEK INDUSTRIES LIMITED
POLICY FOR PRESERVATION OF DOCUMENTS

AND

ARCHIVAL POLICY

In compliance with Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, (hereinafter referred to as ("the Regulations")) the Board of Directors the Company have approved and adopted the following policy on preservation and archiving of documents ("the Policy")

The policy has been approved and adopted by the board of Directors of the Company with effect from December 01, 2015.

DEFINITIONS

1. **"Act"** means the Securities and Exchange Board of India Act, 2015.
2. **"Board"** means the Securities and Exchange Board of India.
3. **"Board of Directors"** means the Board of Directors of the Company, Oceanaa Biotek Industries Limited.
4. **"Company"** means Oceanaa Biotek Industries Limited.
5. **"Document"** includes summons, notice, requisition, order, declaration, form and register, minutes whether issued, sent or kept in pursuance of the policy or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.
6. **"Electronic Form"** means as defined under Section 2 of the Information Technology Act, 2000.
7. **"Electronic Record"** means as defined under Section 2 of the Information Technology Act, 2000.

8. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
9. **“Records”** means any register, index, agreement, memorandum, minutes or any other document required by the Act or the rules made there under to be kept by a company.
10. **“Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Objective:

The purpose of this policy is to establish a systematized framework towards maintenance, preservation and destruction/disposal of documents. The Company is also required to preserve the documents to meet the statutory obligations.

Modes of Preservation:

The Documents may be preserved in

- a) Physical Form
- b) Electronic Form

Destruction of documents:

The documents specified in the Annexures stated below may be destroyed after the expiration of the period indicated against them of the said Annexure.

Record of documents destroyed to be maintained:

A company shall maintain two separate registers as mentioned below wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Managing Director or the Secretary or such other person as may be authorized by the Board of Directors for the purpose.

- (a) Documents whose preservation shall be permanent in nature.
- (b) Documents with preservation period of not less than eight years after completion of the relevant transactions.

Retention of documents:

The following documents shall be preserved on a permanent basis

S.No	Name of the documents
1	Certificate of Incorporation & Commencement of business
2	Memorandum and Articles of Association
3	Other Incorporation Documents (Affidavits, declarations, etc.)
4	Register and Index of Members
5	Register of charges
6	Register of directors and key managerial personnel and their shareholding
7	Register of investment not held in its own name by the Company
8	Register of Share Application and Allotment
9	Register of loans, Guarantees, Security and Acquisition made by the Company
10	Foreign Register of members
11	Register of Contracts with related party and contracts and bodies etc., in which Directors are interested
12	Dividend Register
13	Fixed Assets Register
14	Minutes Book
15	Seal Book
16	Annual reports
17	Books of Accounts including all Accounting & Finance Records

The following documents shall be preserved for a period of eight years

S.No	Name of the documents
1	Minutes book of Board and Committee Meetings, General Meetings
2	Register of sweat equity shares
3	Register of transfer and transmission
4	Register of employee stock option
5	Register of shares or other securities brought back
6	Register of deposits
7	Register and Index of debenture holders or any other security holders
8	Notices, Agendas and notes on agenda, Scrutinizer's Report and other related documents
9	All accounting related documents and records
10	All taxation related documents and records
11	Legal documents and records
12	Records of employees
13	Annual Return

14	Attendance registers
15	Documents and other forms filed with the Registrar of Companies
16	Documents and other forms filed with the Stock Exchange(s)
17	Documents and other forms filed with the Securities and Exchange Board of India
18	All contracts and arrangements
19	All other public documents
20	Any other documents mentioned under the Companies Act, 2013 and SEBI (LODR) Regulations, 2015 and other statutes, as applicable to the Company.

Any other documents/records such as legal documents, tax records and all other documents etc., shall be maintained for a period of eight years. All the electronic documents and physical copies of such electronic documents shall be preserved depending upon the nature of their importance and relevance.

Archival of Documents

The Company shall disclose all such events or information to the Stock Exchanges which are required to be disclosed under Regulation 30 read with Schedule III of the Listing regulations and all such events or information disseminated to the Stock Exchange shall be disclosed on its website www.oceanaabiotek.com under the Investor Info section. All such events or information shall be hosted on the website for a minimum period of five years and thereafter for a period of two years.

Review

The Board of Directors of the Company shall review the policy whenever any mandatory requirement arises with respect to any statute and any such amendment shall be approved by the Board of Directors of the Company.

Amendments

The Board shall have the power to amend the provisions of the policy, as required from time to time pursuant to subsequent amendments to the Regulations.

Any amendments/modifications to the code shall be intimated to the Stock Exchange and displayed on the website of the Company.