

# POLICY FOR PRESERVATION OF DOCUMENTS

## **1. INTRODUCTION**

In pursuance of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), Adventz Securities Enterprises Limited (“the Company”) is required to formulate a policy for preservation of documents. Accordingly, the Board of Directors of the Company at its meeting held on April 14, 2014 approved and adopted “Policy for Preservation of Documents” (“Policy”) which shall be effective from October 5, 2015.

## **2. OBJECTIVE**

This Policy aims to provide a framework for preservation of the documents of the Company required to be maintained in terms of any statutory or regulatory requirements including the provisions of the Companies Act, 2013 and rules made thereunder and the regulations/guidelines / circulars issued by the Securities and Exchange Board of India from time to time.

## **3. DOCUMENTS AND ITS PRESERVATION PERIOD**

### **i) Documents whose preservation shall be permanent in nature:**

All the documents of the Company required by any law or regulation to be maintained or preserved permanently shall be preserved permanently, which includes but shall not be limited to the following:

<b>Sl. No.</b>	<b>Particulars of Documents</b>
i.	Minutes book of meetings of the Board of Directors
ii.	Minutes book of meetings of Committees of the Board
iii.	Minutes book of General Meetings of the members including resolutions passed by postal ballot
iv.	Minutes book of the meetings of creditors
v.	Register of Members along with Index thereof
vi.	Register of Renewed and Duplicate Share Certificates
vii.	Register of Charges
viii.	Register of loans, guarantee, security and acquisition made by the Company
ix.	Register of investments not held in its own name by the Company, if any
x.	Register of contracts with related party and contracts and Bodies etc. in which directors are interested
xi.	Certificate of incorporation and commencement of business
xii.	Register of Directors and Key Managerial Personnel and their Shareholding
xiii.	Books and documents relating to issue of share certificates, in case of disputed cases
xiv.	Documents relating to incorporation and changes in any of the clauses of the Memorandum and Articles of Association

**ii) Documents whose preservation period is atleast eight years after the completion of the relevant transaction/period**

The following documents of the Company shall be preserved and maintained for the periods mentioned below against the respective documents:

<b>Sl. No.</b>	<b>Particulars of Documents</b>	<b>Preservation Period</b>
i.	Books of Accounts together with relevant vouchers	8 Financial Years
ii.	Attendance Register for the Meetings of the Board and its Committees	8 Financial Years
iii.	Attendance Register of General Meetings	8 Financial Years
iv.	Register of debenture holders/other securities holders along with Index thereof	8 years from the date of redemption of debentures or securities
v.	Register of Deposits accepted and renewed	8 year from the financial year in which the latest entry is made in the register
vi.	Register of Proxies	8 Years
vii.	Office copies of Notices, Agenda, Notes on Agenda and other related papers of Board and its Committee meetings	8 Financial Years
viii.	Office copies of Notices, scrutiniser's reports and related papers of General Meetings and postal ballot	8 Financial Years
ix.	Register of Employee Stock Options	8 year from the financial year in which last outstanding stock option have been either exercised or lapsed / cancelled
x.	Instruments creating or modifying the charge	8 years from the date of satisfaction of charge
xi.	Annual Returns prepared under section 92 of the Companies Act, 2013 and copies of all certificates and documents annexed thereto.	8 years from the date of filing with the Registrar of Companies
xii.	Disclosure of interest by Directors	8 Financial Years
xiii.	Shareholding pattern filed with the Stock Exchanges	8 Financial Years
xiv.	Corporate Governance Report submitted to the Stock Exchanges	8 Financial Years
xv.	Reconciliation of share capital audit reports submitted to the Stock Exchanges	8 Financial Years



xvi.	Any other documents submitted or disclosures made to the Stock exchanges	8 Financial Years
xvii.	Books relating to the issue of share certificates (other than in case of disputed cases)	30 years
xviii.	Documents filed with Registrar of Companies or Ministry of Corporate Affairs (other than the documents which are required to be maintained permanently)	8 Financial Years

The documents mentioned above may be destroyed after expiry of the period mentioned against the respective documents after obtaining the approval of the Managing Director;

Provided that if it is prescribed under any law, regulation or Secretarial Standard on Meetings of the Board of Directors or Secretarial Standard on General Meetings that a particular document can be destroyed only after taking approval of the Board of Directors, such document shall be destroyed only after taking approval of the Board of Directors.

**iii) Other Documents**

In case any other document is required by any law or regulation to be maintained permanently or for a specific period of time, it shall be so maintained by the Company.

**4. MANNER OF KEEPING THE STATUTORY DOCUMENTS**

The Company may keep and maintain the documents in either physical or electronic mode or both.

**5. AMENDMENT**

This Policy may be amended, modified or revised by the Board of Directors of the Company from time to time. In case any provisions of this Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, Rules framed thereunder and Listing Regulations (“Statutory Provisions”), the provisions of Statutory Provisions shall prevail.