

# IVL LIMITED

## PRESERVATION OF DOCUMENTS POLICY

### 1. PREAMBLE

The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The Listing Regulations come into force from December 1, 2015. The Listing Regulations mandate listed entities to formulate a Policy for preservation and archiving of documents. It is in this context that the Document Retention and Archival Policy (“Policy”) is being framed and implemented.

### 2. SCOPE

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

### 3. OBJECTIVES 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.

The major objectives of the policy are:

- Identification of statutory registers and other records of the Company which are required to be preserved.
- Identification and categorisation of the statutory registers and other records to be maintained specifying the retention period for each of such register / record.
- Decide whether the statutory records and documents are to be preserved in physical form or in electronic form.
- After completion of the mandatory period prescribed for preservation of the statutory documents, the same may be disposed of as per the guidelines of the Policy or as decided by the Board of Directors at the required time.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

### 4. DEFINITIONS

- i. **“Act”** means the Companies Act, 2013, Rules framed there under and any amendments thereto;
- ii. **“Key Managerial Personnel”** means Whole time Director, Chief Executive Officer, Chief Financial Officer and Company Secretary of IVP Limited.
- iii. **“Management”** means Whole time Director(s), Chief Executive Officer, Chief Financial Officer and Company Secretary
- iv. **“Authorised Person(s)”** means Whole Time Director, Company secretary.
- v. **“Regulations”** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;
- vi. **“Company”, “This Company”, “The Company”, “Company”** wherever occur in the policy shall mean **“IVP Limited”**.
- vii. **“Current”** means running matter or whatever is at present in course of passage.

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- viii. **"Board of Director"** or **"Board"**, means the collective body of the Directors of the company;
- ix. **"Policy"** or **"This Policy"** means, "Policy on Preservation of Documents."
- x. **"Maintenance"** means keeping Documents, either physically or in Electronic Form.
- xi. **"Preservation"** means to keep in good order and to prevent from being altered, damaged or destroyed.
- xii. **"Electronic Form"** means any contemporaneous electronic device including 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 or access to it.

### 5. INTERPRETATION

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.

### 6. MODES 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 or where such a person is not clearly identifiable, the Key Managerial Persons of the Company.

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.

#### **- Destruction of documents**

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure- A** may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under Annexure-A. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at **Annexure B** and shall be put up to the Board for information on timely basis. The entries in the register shall be authenticated by the Authorised Person.

### 7. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

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### **ANNEXURE - A**

#### **Indicative list**

#### **A) PERMANENT PRESERVATION:**

- a. Common Seal
- b. Minutes books of Board, General Meetings and Committee Meetings
- c. Statutory Registers:
  - Register of Members,
  - Register of Directors and Key Managerial personnel and their Shareholdings,
  - Register of Renewed and Duplicate Share Certificate,
  - Register of Charges and
  - Register of Contracts With Related Party and Contracts and Bodies etc. In which Directors are interested.
- d. Licenses and Permissions
- e. Statutory Forms and disclosures except for routine compliance
- f. Scrutinizers' Reports

#### **B) TEMPORARY PRESERVATION UPTO THE MANDATORY PERIOD:**

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. Office copies of Notice of General Meeting and related papers
- e. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers
- f. All notices pertaining to disclosure of interest of directors
- g. Instrument creating a charge or modification
- h. Books of accounts, financial statements etc.

#### **C) OTHERS:**

As per applicable law

### **ANNEXURE- B**

#### **Specimen format of the register of documents disposed of / destroyed**

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON