

AAGAM CAPITAL LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

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1. Introduction

Securities and Exchange Board of India (SEBI) issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') with the aim to consolidate and streamline the provisions of existing listing agreements for different segments of capital markets such as equity shares (including convertibles), non convertible debt securities, etc. and disclosure norms in relation thereto, thereby ensuring better enforceability. The said regulation has been made effective from 1st December,2015 and the said regulations requires that every listed company shall require to have preservation of documents policy.

2. Objective

The main aim of creating this policy is to ensure that all statutory records are preserved for as long as prescribed in the law without being tempered , mutilated or amending in any manner by the authorized persons of the company either in physical or electronic form. Further this policy also ensures that records which are no longer required or after being completion of timeframe prescribed under the law for its preservation are being destroyed in accordance with this policy by the officers authorized by the Board of Directors of the Company.

3. Definitions

- (i) **Act** means the Companies Act,2013 and rules made thereunder and its amendments made therein from time to time.
- (ii) **Regulations** means Securities and Exchange Board of India (Listing on Obligation and Disclosure Requirements) Regulations,2015 and amendment made therein from time to time.
- (iii) **Board of Directors** means the collective body of the Directors of the Company.
- (iv) **Policy** means the Preservation of Documents Policy.
- (v) **Maintenance** means to keep the documents either in physical or electronic mode.

(vi) **Preservation** means to keep the documents in good order and to prevent from being alter, damaged or destroyed.

(vii) **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 or retrival device considered feasible whether the same is in possession or of control of the company or otherwise the company has control over access to it.

4. Policy and Procedures

Pursuant to the provisions of regulation 9 of the SEBI(Listing Obligation and Disclosure Requirements)Regulations,2015 company has prepare this Preservation of Documents Policy duly approved by the Board of Directors of the Company classifying the documents into two categories as follows

(i) Documents whose preservation shall be permanent in nature

(ii) Documents with preservation period of not less than eight years after completion of relevant transactions

Accordingly the company will preserved the documents in the above mention manner and also preserve the other documents that's require to be preserve and retained for such period as required under any statute, regulations, stipulation of court, tribunal or quasi judicial body. A list of documents and the time period for their preservation is given in the Annexure – 1.

5. Manner of Preservation

The regulation provides that the documents may be preserved either in electronic form or in physical form. The responsibility of preserving various documents of the company lies on the concerned officer in charge of various departments of the company. The preservation of documents should be such that it does not give any chance of tampering, alteration, destruction or anything endangering the content , authenticity, utility or accessibility of the documents.

The documents preserved above should be accessible by the authorized person and all such documents mention above shall be destroyed after completion of the time frame prescribed above by the authorized person. All such destruction should be done by the authorized person and recorded in the register maintained for such purpose.

6. Review of the Policy

The above policy will be reviewed by the Board of Directors from time to time and changes will be made therein in accordance with the legal requirements.

Annexure – 1

(i) Documents to be preserved Permanently

- Register and Index of Members
- Common Seal of the Company
- Minutes of Board, General Meeting and Committee Meetings.
- Statutory Registers, Forms, Scrutinizers Reports.
- Licenses , Permissions, Clearances etc.

(ii) Documents to be preserved upto Eight Years

- Annual Returns of the Company
- Books of Accounts and Financial Statements of the Company
- Notice , Agenda, Attendance Register of Board and Committee Meetings
- Register of Debenture Holders or other security holders
- Instrument Creating Charge or Modification

(iii) Other Documents

- As prescribed under the applicable regulation or otherwise by court, tribunal or quasi judicial body.