



Excel Industries Ltd.

Corporate & Registered Office



POLICY FOR PRESERVATION OF DOCUMENTS

FOREWORD:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires every listed entity to formulate a policy for Preservation of Documents. The Company has, accordingly, adopted following policy for Preservation of Documents at its Board meeting held on 06th November, 2015. This policy shall take effect from 1st December, 2015.

OBJECTIVE OF THE POLICY:

The objective of the Policy is to make a frame work for classification of documents which are required to be preserved permanently or at least for 8 years and to ensure their availability for easy retrieval, when needed.

TIME PERIOD FOR PRESERVING THE DOCUMENT:

Time period for preservation of the documents is classified into the following two categories:

1. Documents required to be maintain permanently
2. Documents required to be maintain atleast for 8 years

Following documents shall be maintained permanently:

- a) Documents related to acquisition of and evidencing title to the immovable properties, Government approval letters, sanction letters, permissions from government authority, Court Orders, Legal Agreements, and any other Statutory and Legal documents.
- b) Register of Loans, Guarantee, Security and Acquisition made by the Company (Form MBP 2)
- c) Register of Investments (Form MBP 3)
- d) Register of Contract (Form MBP 4)
- e) Register of Charge
- f) Minutes of General Meeting of Shareholders and Creditors Meetings
- g) Minutes of Board and Committee Meetings
- h) Register of duplicate share certificates
- i) Memorandum and Articles of Association
- j) Documents evidencing ownership of intellectual property rights
- k) Registers of Members with index (including Foreign Register of Members)
- l) Annual return of the Company and copies of all certificates and documents annexed thereto



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- m) Notices of meetings of shareholders and creditors including explanatory statements.
- n) Registration certificates under Direct Taxation Laws
- o) Registration certificates under Indirect Taxation Laws
- p) Certificate of incorporation of the Company, certificates of registration, licenses, permits, consents etc. under various statutory statues such as those relating to Factories Act, Industrial Licensing, Shops & Establishment, Pollution Control, Foreign Trade, Provident Fund, Employees Pension Scheme, ESIS, etc.

Following documents shall be maintained for atleast for 8 years or such longer period as the Head of the function may decide based on specific requirements/ circumstances:

- a) Books of Accounts, Purchase, Sales including vouchers, Sales Purchase invoices and other supporting documents related to Books of Account
- b) Disclosure from Directors (Form MBP 1 and DIR 8)
- c) Register of Fixed Deposit
- d) Register of debenture-holder including an index of the names
- e) Foreign register of debenture-holder or any other security holders
- f) All books and documents relating to the issue of share certificates
- g) Returns, disclosures, filings, etc. with regulatory authorities under various enactments - e.g. periodical reports/returns to SEBI, Stock Exchange, authorities under the laws relating to income-tax, excise and customs, service tax, value added tax, sale tax, etc.
- h) Dividend Register & paid instrument
- i) Notes on agenda for meetings of the Board of Directors and its Committees
- j) Register of FD Interest & paid instrument.

Following documents shall be maintained for atleast for 1 year beyond the period of their relevance:

- a) Confidentiality and non-disclosure agreements
- b) Records relating to employees
- c) Documents relating to litigation or arbitration
- d) Commercial contracts
- e) Bonds, undertakings etc lodged with the concerned authorities under various laws- e.g. Customs & Central Excise law

Other than above specified, documents shall be maintained for the period of their relevance as per the discretion of the concerned Functional Head



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MODE OF PRESERVATION OF DOCUMENT:

The company shall preserve documents in electronic or physical form with proper security for accessing documents

SAFEKEEPING OF DOCUMENTS PRESERVED PHYSICALLY:

1. Proper place and cupboard or racks which are fire and weather proof should to be used for storing of documents.
2. Care should be taken to prevent fire at the storage/record room.
3. Storage/Record rooms should be kept clean, so that pest, fungus, rats do not damage documents.
4. Good quality files should be used for filing of documents.
5. A Register Index of the documents stored should be maintained and updated from time to time.
6. Important documents should be kept secured in the custody of responsible person.

SAFEKEEPING OF DOCUMENT PRESERVED ELECTRONICALLY:

1. Computes, Servers and Laptops, Hard Discs, electronic storage media, where files are stored should be protected from virus.
2. Backups of the documents should be maintain and updated time to time.
3. Important documents should be kept protected by password.

Ashwin C Shroff
Chairman & Managing Director

06.11.2015