

PAUSHAK LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

Details of Amendments to the Policy				
Policy Change effective Date	Clause No.	Particulars of the Change	Board Approval Date	Version of Policy
1 st December, 2015	-	Adoption of Policy	30 th October, 2015	Original
19 th May, 2020	9	Change in Authorised Persons to amend the Policy	19 th May, 2020	V-2
4 th May, 2023	9	Change in Authorised Persons to amend the Policy	4 th May, 2023	V-3

1. INTRODUCTION

The Companies Act, 2013 and other previous company law (Companies Act, 1956, to the extent applicable) and the Rules (“Rules”) framed thereunder contain provisions for maintenance of various documents including registers and records by the Companies; the place at which such documents are to be maintained and the period for preserving such documents.

The Securities and Exchange Board of India (“SEBI”) has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations, 2015”) which shall be applicable to all listed entity with effect from 1st December, 2015. The Listing Regulations, 2015 shall replace the existing Listing Agreement entered into by the Company with the Stock Exchange.

The Listing Regulations, 2015 inter alia contain provisions for Preservation of Documents and are re-produced as under:

Regulation 9: Preservation of Documents

The listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-

- (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:

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

2. OBJECTIVE

The objective of this policy is to prescribe a policy for preservation of documents in compliance with the requirements of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 and other corporate laws.

3. APPLICABILITY AND EFFECTIVE DATE

This Policy shall be applicable to the Company with effect from 1st December, 2015.

The documents, for which no period of preservation has been stipulated under any statutory provision, shall be preserved in accordance with the Clause 5(c) of this policy.

4. DEFINITIONS

“Act” means the Companies Act, 2013 or any previous company law (to the extent the provisions there under are in force) and Rules framed there under, including any amendments, modifications, clarifications or re-enactment thereof, for the time being in force.

“Articles” means the articles of association of a company as originally framed or as altered from time to time or applied in pursuance of the Act.

“Book and Paper” and “book or paper” includes books of account, deeds, vouchers, writings, documents, minutes and registers maintained on paper or in electronic form.

“Books of Account” includes records maintained in respect of—

- (i) all sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place;
- (ii) all sales and purchases of goods and services by the company;
- (iii) the assets and liabilities of the company; and
- (iv) the items of cost as may be prescribed under section 148 in the case of a company which belongs to any class of companies specified under that section.

“Board of Director or Board” means Board of Directors of the Company.

“Company” means Paushak Limited.

“Document” includes summons, notice, requisition, order, declaration, form and register, records, whether issued, sent or kept in pursuance of this Act or previous company law or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.

“Memorandum” means the memorandum of association of a company as originally framed or as altered from time to time in pursuance of any previous company law or of this Act.

“Policy” means this Policy for Preservation of Documents and schedules appended thereto.

“Listing Regulations, 2015” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and includes any amendments, modifications, clarifications or re-enactment thereof, for the time being in force.

[Words and expressions used and not defined herein shall have the meanings as respectively assigned to them in the respective Act / Rules / Regulations]

5. PRESERVATION OF DOCUMENTS

As per the Policy, the Company shall maintain and preserve register and records, books and/or paper, books of accounts etc., (“Documents”) as follows:

- a) Documents to be preserved permanently;
- b) Documents to be preserved for eight years; and
- c) Documents to be preserved for two years.

a) Documents to be preserved permanently;

As required under the provisions of the Act / Rules / Regulations, the documents which are required to be preserved on permanent basis shall be maintained and preserved by the Company permanently.

b) Documents to be preserved for eight years

As required under the provisions of the Act / Rules / Regulations, the documents which are required to be preserved for a period of eight years shall be maintained and preserved by the Company accordingly.

c) Documents to be preserved for two years.

In cases of documents for which no period is specified under the Act / Rules / Regulations, such documents shall be maintained by the Company for a period of two financial years from the close of relevant financial year.

Documents to be maintained under this Policy shall be preserved in Physical or in Electronic Form/Mode as per the provisions of the Act / Rules / Regulations.

Documents not covered under the schedules above may be preserved for the period as prescribed under the relevant statute. In absence of any such provisions therein, such documents shall be preserved for minimum period of five years, provided however that approval of the Board or Committee thereof shall be taken before destruction of such documents.

6. DESTRUCTION OF DOCUMENTS

The documents specified in Clause 5(b) & 5(c) to this Policy, kept by the Company, may be destroyed after the expiration of the periods specified in the respective Schedules.

7. REGISTER OF DOCUMENTS DESTROYED

The Company shall maintain a register for documents destroyed as per this Policy. The Register of Documents Destroyed shall contain brief particulars of the documents destroyed, date and mode of destruction and all entries made therein shall be authenticated by the respective functional heads.

8. BOARD APPROVAL

The Board of Directors of the Company at its meeting held on 30th October, 2015 has approved the Policy on Preservation of Documents.

9. CHANGE IN MANAGEMENT

The Executive Director(s) and Key Managerial Personnel of the Company are authorized by the Board of Directors of the Company to amend any of the provisions of the policy, substitute any of the provisions with the new provisions or replace the policy entirely with a new policy.

Any amendments in the policy undertaken by the Executive Director(s) and Key Managerial Personnel shall be informed to the Board in the ensuing Board Meeting.
