

CEIGALL INDIA LIMITED

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POLICY NO: CIL/HR-POL-_/2023 NAME OF POLICY- POLICY FOR PRESERVATION OF DOCUMENTS

1. Preface

The Board of Directors (the "Board") of Ceigall India Limited (the "Company") has approved the following Policy ("The Policy") of the Company for preservation of Documents/Records (hereinafter referred to as "the Documents") maintained by the Company either in Physical Mode or Electronic Mode. This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

2. Purpose

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

3. Interpretation:

The words and expressions used and not defined in this policy but defined in the Companies Act, 2013 or rules made there under or the Securities and Exchange Board of India Act, 1992 or regulation made there under or Depositories Act, 1996 shall have the same meanings respectively assigned to them in those acts, rules and regulations.

4. Policy for Preservation of Documents

The documents to be preserved under this policy are divided in the following categories:

a) Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time; (List of such Documents are given in Annexure A).

b) Other Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. (List of such Documents are given in Annexure B)

The Company may keep the Documents specified above in clauses (a) & (b) in electronic mode.

5. Roles & Responsibilities:

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

6. Applicability and Modes of Preservation:

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

The Registrar and Share Transfer Agent shall ensure that the correct procedures are followed for maintenance of the Records required to be maintained by them.

7. General:

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company from time to time.

8. Dissemination of the Policy

This policy shall be uploaded on the website of the Company.

9. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

Effective Date: dd/mm/yyyy

Date of the approval by the Board: dd/mm/yyyy

Sd/-Managing Director's Signature

Annexure A

Documents whose preservation shall be permanent in nature:

- 1. Memorandum / Articles of Association
- 2. Registration Certificates
- 3. Licenses & Statutory Approvals.
- 4. Statutory Registers required under applicable laws.
- 5. Policies, Charters and Codes of the Company.
- 6. Audited financial statements.
- 7. Minutes of General Meeting.
- 8. Minutes of Board Meeting.
- 9. Minutes of Statutory Committee Meetings.
- 10. Material Agreements/Contracts, which, even if terminated, may have an impact on business.
- 11. Orders/judgments issued by Courts/statutory bodies and other background documents relevant for understanding such Orders.
- 12. Investment documents/proofs including certificates, etc.
- 13. Title deeds and documents pertaining to immovable freehold and leasehold properties.
- 14. Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.
- 15. Tax-Exemption, Subsidy documents and related correspondences.

Annexure B

Documents preserved for a period of not less than eight (8) years:

- 1. Books of Accounts.
- 2. Annual Return(s).
- 3. Personnel Documents after retirement/resignation of the person concerned.
- 4. Insurance Policies/ Claims under various policies after expiry or receipt of claim.
- 5. Correspondences with Departments/shareholders.
- 6. Non-Statutory Registers/Documents.
- 7. Documents as are required to be maintained under relevant laws relating to direct and indirect tax.
- 8. Any other document as may be required to be maintained for eight years in terms of applicable law(s).