



## **OSWAL AGRO MILLS LIMITED**

### **POLICY ON PRESERVATION OF DOCUMENTS**

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## POLICY ON PRESERVATION OF DOCUMENTS

### 1. LEGAL FRAMEWORK

Pursuant to Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), all listed entities are required to formulate and put in place a Policy for Preservation of Documents classifying them into two categories:

- i. Documents whose preservation shall be permanent in nature; and
- ii. Documents to be preserved for not less than 8 years.

### 2. PREAMBLE

This policy aims to provide a framework for preserving and maintaining records of the Company. During the course of business, the Company generates several records either in physical or in electronic modes, some of the records are useful for a shorter span of time, hence such records are kept for a definite period of time, whereas some records may be needed to be kept permanently during the lifetime of the organization. In order to preserve such records, the Company needs to implement a well-considered, well-documented policy in order to ensure that they remain relevant and useful over a period of time.

### 3. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company, which are broadly classified in the following two categories:

- A) The documents, which are of a permanent nature (**listed in Annexure 1**), shall be maintained and preserved permanently by the Company, subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- B) Other documents (**listed in Annexure-2**) shall be maintained and preserved by the Company for the term not less than eight years after completion of the relevant transactions or for such higher period as the Board may in its sole discretion determine in case to case basis, subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified in clause (A) and clause (B) in electronic mode.

#### **4. ADMINISTRATION**

The Compliance Officer of the Company shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Compliance Officer is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with applicable laws.

#### **5. PROCEDURE FOR DISPOSAL OF DOCUMENTS**

In case of documents as specified in clause 3 (B) above, after the expiry of the specified retention period, with the prior approval of the Board, the preserved documents may be destroyed in such manner and under the supervisions and instructions given by the respective functional head, CFO or Compliance Officer, as the case may be. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

Company shall maintain a register of records destroyed from time to time and respective entries therein shall be signed by respective functional head, CFO or Compliance Officer, as the case may be.

This applies to both Physical and Electronic Documents.

#### **6. AMENDMENTS**

The Board may, subject to the applicable laws, amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

#### **7. DISCLOSURE:**

This Policy will be communicated to all operational employees and other concerned persons of the Company.

## ANNEXURE I

### Documents whose preservation shall be permanent in nature

<u>S. No.</u>	<u>Nature of Document(s)</u>
1.	Certificate of incorporation
2.	Certificate for commencement of business
3.	License Issued by Regulatory Authority
4.	Memorandum and Articles of Association
5.	Counter folios of Share Certificates issued from time to time
6.	Register of Renewed and Duplicate Share Certificate
7.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
8.	Minute Books of General Meetings, Board and Committee Meetings
9.	Register of Member
10.	Register of Charges
11.	Register of Contracts or arrangements in which directors are interested
12.	Register of Loans, Guarantee, Security and Acquisition made by the Company
13.	Registers of investments in securities not held in the name of the Company
14.	Register of Transfer of shares
15.	Material Agreements/Contracts
16.	Any other documents maintained in terms of applicable law(s) and such Law obligates the documents to be preserved permanently.

**ANNEXURE II****Documents with preservation period of not less than eight years after completion of the relevant transactions:**

<b>S. No.</b>	<b>Nature of Document(s)</b>
<b>1.</b>	Register of Debenture holders or any other security holders, along with Index
<b>2.</b>	Registers of deposits (for a period of not less than eight years from the financial year in which the latest entry is made in the register)
<b>3.</b>	The instrument creating a charge or modification (preserved for a period of eight years from the date of satisfaction of charge by the company)
<b>4.</b>	Annual Returns along with the annexures attached thereto
<b>5.</b>	Annual reports
<b>6.</b>	Books of Accounts (8 Financial Years preceding Current Financial Years) under Section 128 of Companies Act, 2013
<b>7.</b>	Attendance Register
<b>8.</b>	Office copies of Notices, Agenda, Notes on Agenda, scrutiniser's report and other related papers
<b>9.</b>	Statutory Register maintained under Companies Act, 2013 and not specified above in Annexure I
<b>10.</b>	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
<b>11.</b>	Income Tax and other returns filed under Income Tax Act, 1961
<b>12.</b>	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
<b>13.</b>	Return of declaration in respect of beneficial interest in any share under Companies Act, 2013
<b>14.</b>	All show cause notice or any other notice received from any statutory , government departments, Judicial or Quasi-judicial authority etc.
<b>15.</b>	Any other documents as may be required to maintain in terms of applicable law(s) maintained and preserved from time to time.
<b>16.</b>	Documents filed with Stock Exchanges under various SEBI Regulations
<b>17.</b>	Compliances filed with Stock Exchanges where shares of the Company are Listed under Listing Agreement and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
<b>18.</b>	Other Statutory Documents prepared by the Company under any applicable Law for the Preservation of which no time frame has been prescribed under that Law or any other Law .