

# **DHAMPUR SUGAR MILLS LIMITED**

## **Policy for Preservation of Documents**

### **Preamble**

Regulation 9 the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Regulations") requires every listed Company to have a Policy for preservation of documents.

In view of the above, the Company has framed this Policy for Preservation of Documents (the "Policy").

The Board of Directors, through this Policy is required to classify the documents in categories as follows-

- (a) documents whose preservation shall be permanent in nature (Annexure A);
- (b) documents with prescribed preservation period but not permanent in nature (Annexure B);
- (c) documents whose preservation period is not prescribed.

Provided further that the Company may keep the documents as specified above in an electronic mode.

### **Documents**

For the purpose of this policy, documents shall include all official papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

### **Preservation of Documents**

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the Rules made thereunder, Secretarial Standards, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any other law, rule, regulations applicable on the Company from time to time.

In case of documents where no period for retention of such documents is prescribed or mandated by law, the retention period will be approved by the respective Head of Departments.

### **ROLES & RESPONSIBILITIES**

The respective Heads of Departments of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

### **DESTRUCTION OF DOCUMENTS**

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). This applies to both Physical and Electronic Documents.

## **REVIEW OF POLICY**

This Policy shall be subject to review, if necessary. Any change/amendments to this Policy shall be approved by the Board of Directors.

### **Annexure A**

#### **Permanent Records :**

<b>Sr No.</b>	<b>Section/Rules/Clause</b>	<b>Type of Document</b>	<b>Form Specified</b>
1.	Section 7(4)	Memorandum of Association and Articles of Association	
2.	Section 186(9) and Rule 12(1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of loans, guarantee, security and acquisition of securities made by the company	Form No. MBP 2
3.	Section 187(3) and Rule 14(1) of the Companies (Meetings of Board and its Powers) Rules, 2014.	Register of investments not held in its own name by the company	Form No. MBP 3
4.	Section 189(1) and Rule 16(1) of the Companies (Meetings of Board and its Powers) Rules, 2014.	Register of contracts or arrangements in which directors are interested	Form No. MBP 4
5.	Section 85 and Rule 10(4) of Companies (Registration of Charges) Rules, 2014	Register of charges	Form No. CHG 7
6.	Section 88 and Rule 15(1) of the Companies (Management and Administration) Rules, 2014.	Register of Members alongwith index of the names	Form No. MGT.1
7.	Section 88 and Rule 15(4) of the Companies (Management and Administration) Rules, 2014.	Foreign register of members	Form No. MGT.3
8.	Rule 25(1)(e) of the Companies (Management and Administration) Rules, 2014 and Clause 18.1 of Secretarial Standard 2	Minutes of General Meeting including Minutes of all Meetings of the transferor company under a scheme of arrangement	
9.	Rule 25(1)(f) of the Companies (Management and Administration) Rules, 2014 and Clause 8.1 of Secretarial Standard 1	Minutes of Board or Committee Meetings including Minutes of all Meetings of the transferor company under a scheme of arrangement	
10.	Rule 6(3) of the Companies (Share Capital and Debentures) Rules, 2014.	Register of Renewed and Duplicate Share Certificates	Form No. SH.2

## Other Records :

Sr No.	Section/Rules/Clause	Type of Document	Preservation Period	Form Specified
1.	Section 128(5)	Books of Account including vouchers relevant to any entry in such books of account	<b>8 financial years</b> preceding current FY.	
2.	Rule 9 of Companies (Meetings of Board and its Powers) Rules, 2014.	Disclosures/ Notices by a director of his interest	For a period of <b>8 years</b> from the end of the financial year to which it relates	Form No. MBP 1
3.	Rule 14(3) of Companies (Acceptance of Deposits) Rules, 2014	Registers of deposits	For a period of not less than <b>8 years</b> from the financial year in which the latest entry is made in the register	
4.	Section 85 and Rule 10(4) of the Companies (Registration of Charges) Rules, 2014	The instrument creating a charge or modification	For a period of <b>8 years</b> from the date of satisfaction of charge by the company	
5.	Section 88 and Rule 15(3) of Companies (Management and Administration) Rules, 2014.	Annual return and copies of all certificates and documents required to be annexed thereto	For a period of <b>8 years</b> from the date of filing with the Registrar	
6.	Rule 7(3) of the Companies (Share Capital and Debentures) Rules, 2014.	All books and documents relating to the issue of share certificates, including the blank forms of share certificates	Not less than <b>30 years</b> and in case of disputed cases shall be preserved permanently	
7.	Rule 7(3) of the Companies (Share Capital and Debentures) Rules, 2014.	All certificates surrendered to a company shall immediately be defaced by stamping or printing the word "cancelled" in bold letters	May be destroyed after the expiry of <b>3 years</b> from the date on which they are surrendered, under the authority of a resolution of the Board and in the presence of a person duly appointed by the	

			Board in this behalf.	
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Sr No.	Section/Rules/Clause	Type of Document	Preservation Period	Form Specified
8.	Rule 3(2)(d) of the Companies (Meetings of Board and its Powers) Rules, 2014	Tape recording(s) or other electronic recording mechanism used for Board meetings held through video-conferencing or audio-visual means	At least upto the time of completion of audit of that particular year	
9.	Clause 4.1.7 of Secretarial Standard 1	Attendance register of Board and Committee Meeting	For a period of at least <b>8 financial years</b> and may be destroyed thereafter with the approval of the Board.	
10.	Clause 8.2 of Secretarial Standard 1	Office copies of Notices, Agenda, Notes on Agenda and other related papers of Board and Committee Meeting.	To be preserved in good order in physical or in electronic form for as long as they remain current or for <b>8 financial years</b> , whichever is later and may be destroyed thereafter with the approval of the Board.	
11.	Clause 18.2 of Secretarial Standard 2	Office copies of Notices, scrutiniser's report, and related papers of the General Meeting	To be preserved in good order in physical or in electronic form for as long as they remain current or for <b>8 financial years</b> , whichever is later and may be destroyed thereafter with the approval of the Board.	

