



“DHAMPUR BIO ORGANICS LIMITED”

“POLICY ON PRESERVATION OF DOCUMENTS”

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1. BACKGROUND:

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

The Board of Directors (“Board”) of Dhampur Bio Organics Limited (“Company”) has adopted this Policy with regard to Preservation of Documents as prescribed in the Regulations.

2. SCOPE:

This Policy is framed to preserve all physical and electronic records generated/maintained in the course of Company’s operations, both original documents and reproductions. This Policy covers all the documents required to be preserved 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.

3. GENERAL PRINCIPLES:

The main principle of this policy is 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 (Annexure C).

Pursuant to provisions of Regulation 9 of the Listing Regulations, the Company may keep documents above specified in electronic mode.

4. 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.

5. 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.

6. AMENDMENTS TO THE POLICY:

The Policy is to be reviewed by the Board of Directors as and when any changes are to be incorporated in the policy due to change in the Regulations or as may be felt appropriate by the Board. The Board of Directors on its own, can amend this Policy, as and when deemed fit.

In case of any subsequent amendment(s), clarification(s), circular(s) in the provisions of the law or any other regulations ("the Regulations") which makes any of the provisions in the policy inconsistent with the said Regulations, then such amendment(s), clarification(s), circular(s) etc. would prevail over this Policy and the provisions in the policy shall stand amended accordingly to make it consistent with such amendment(s), clarification(s), circular(s) etc.

7. DISCLOSURE OF THE POLICY:

This Policy shall be posted on the website of the Company.

The necessary disclosure, if any, about the policy will also be made as per the requirements of LODR Regulations and Companies Act 2013.

ANNEXURE A: PERMANENT RECORDS

Sr No.	Section/Rules/Clause	Type of Document	Form Specified
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
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ANNEXURE B: OTHER RECORDS

Sr No.	Section/Rules/Clause	Type of Document	Preservation Period
1.	Section 128(5)	Books of Account including vouchers relevant to any entry in such books of account	8 financial years 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 8 years from the end of the financial year to which it relates
3.	Rule 14(3) of Companies (Acceptance of Deposits) Rules, 2014	Registers of deposits	For a period of not less than 8 years 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 8 years 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 8 years 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 30 years 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 3 years 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.
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 8 financial years 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 8 financial years , 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 8 financial years , whichever is later and may be destroyed thereafter with the approval of the Board.

ANNEXURE C: DOCUMENTS WHOSE PRESERVATION PERIOD NOT PRESCRIBED

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.
