



## MADHUCON PROJECTS LIMITED

### Policy on Document Retention & Archival

#### **1. Introduction**

At the core of Madhucon Projects limited (Company) is the value that is emphasised on adherence to good Corporate Governance and managing its affairs in a fair, honest, ethical, transparent and legal manner. This policy is formulated to make sure that all employees and directors of the Company work to the highest standards of ethics while maintaining a cordial business like atmosphere at all times

#### **2. Scope**

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR Regulations") requires listed companies to frame an archival policy for disclosure of events or information which has been disclosed to stock exchange, on its website.

This Policy is framed in accordance with the above requirements of the LODR Regulations, notified on 2nd September 2015 and other SEBI Circulars as may be specified in this regard. This policy shall be effective from 1st December 2015 being the date when the LODR Regulations become effective.

The policy is formulated to retain events or information which has been disclosed to Stock Exchange(s), on the website of the Company, for such period so as to satisfy statutory or regulatory requirements. This policy covers all events or information which has been disclosed to Stock Exchange(s) under Regulation 30 of the LODR Regulations.

The events or information which has been disclosed by the Company to the Stock Exchange(s) under Regulation 30 of the LODR Regulations will be hosted on the website of the Company for a period of five years. These disclosures may be removed / deleted from the website after expiry of five years from date of its initial posting/ hosting.

This Policy is applicable to all documents maintained in physical and electronic mode by the Company.

The documents not 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.

#### **3. Regulatory framework**

Regulation 9 of SEBI LODR requires the Board of Directors of the Company to formulate a policy for preservation of documents classified into two categories:

- Documents whose preservation shall be permanent; and
- Documents to be preserved for not less than eight years (8 years) after completion of the relevant transactions.

Regulation 30 (8) of SEBI LODR requires the Company to frame an Archival Policy to determine the period for which all the events and information disclosed to the stock exchanges by the Company shall be hosted on the website of the Company. The Board of Directors shall review the policy periodically and may amend the same from time to time, as may be deemed necessary.



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### 4. Mode of preservation

The company shall keep the documents in electronic mode or physical mode and in such manner as the Board of Directors may deem fit such that the records are maintained in accordance with SEBI LODR and Companies Act, 2013 and rules and regulations made thereunder.

### 5. Documents to be preserved permanently

#### A. Companies Act, 2013

1. Memorandum and Articles of Association as amended from time to time
2. Certificate of Incorporation
3. Certificate of Commencement of Business
4. Register of Contracts
5. Register of Directors and KMPs and the securities held by them
6. Register of Loans and Investments made by the Company
7. Register of Index and Members
8. Minutes of the Board, Committees of the Board, General Meetings including meetings conducted through Postal Ballot
9. Resolutions passed by circulation
10. Various forms and returns filed with the authorities
11. Audited Financial Statements
12. Excise Returns, Income Tax Returns, Sales Tax Returns, Service Tax Returns
13. Order issued by Courts/ Statutory Bodies
14. All acquisitions and merger related papers

#### B. SEBI LODR

1. Listing Agreement executed with the Exchange
2. Trading approval relating to listing of securities
3. Offer documents for Public issue and private placement of securities filed with

SEBI

#### C. Depositories Act

1. Confirmation of all Corporate Actions with respect to allotment of securities
2. Intimation on allotment of ISIN for securities issued

#### D. Others

1. Register of Records and Documents destroyed.

Any other documents as may be required to be maintained permanently under applicable laws, maintained and preserved from time to time



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### **6. Documents to be preserved for not less than 8 years**

#### **A. Companies Act, 2013**

1. Register of Buy-Back of securities from the date of completion of Buy-Back
2. Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballot
3. Notices pertaining to disclosure of Interest by the Directors
4. Annual Returns with annexures
5. Register of Charges
6. Register of Debentures
7. Books of Accounts including vouchers and bills
8. Register of transfer and transmission of shares
9. Register of renewed and duplicate certificates
10. Documents relating to appointment of Managerial Personnel
11. Dividend reconciliation statement till the time the dividend is transferred to IEPF
12. Scrutinizers Report on AGM and Postal Ballot

#### **B. SEBI LODR**

1. All reports filed with the Stock Exchange from time to time
2. Disclosures of various events and press releases
3. Intimations of Board Meetings

#### **C. Other SEBI Regulations**

1. SEBI (Substantial Acquisition of Shares and Takeover) Regulation, 2011
2. SEBI (Prohibition of Insider Trading) Regulation, 2015
3. SEBI (Share Based Employee Benefit) Regulation, 2014
4. SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines, 1999

The above policy has been approved by the Board of Madhucon Projects Limited at its meeting held on 28<sup>th</sup> May, 2019.