

Policy for Maintenance and Preservation of Documents

1. PREFACE

The Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015, (“Regulations”) requires every listed company to formulate a policy for Preservation of Documents which has to be approved by the Board of Directors.

In this context the following policy has been framed by the Board of Directors (the “Board”) of Hind Syntax Limited (the “Company”) in accordance with Regulation 9 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation. This Policy shall be known as “Policy for Maintenance and Preservation of Documents”.

2. APPLICABILITY

This policy is applicable to all Documents maintained in physical and electronic mode by the Company. All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

The Documents not covered under this Policy shall be preserved and maintained by the Company in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

3. PURPOSE OF THE POLICY

The purpose of this Policy is to specify the type of document(s) and time period for preservation thereof based on the classification mentioned under Regulation 9 of Listing Regulations, 2015.

4. TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The Regulations requires the Board of Directors of a Company to frame a Policy for Preservation of Documents classifying them into two categories. The company shall maintain and preserve documents as specified hereunder:

Category (A): Documents whose preservation shall be permanent

The documents of permanent nature (listed in Annexure-A) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

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Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

Category (B): Documents to be preserved for not less than 8 years

The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in Annexure-B) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

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

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognises that documents whether in physical or electronic mode, forms an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

For the purpose of this policy, document may include the following:

'books and papers' as defined in clause 12 of section 2 of the Companies Act, 2013;
'books of accounts' as defined in clause 13 of section 2 of the Companies Act,2013;
'documents' as defined in clause 36 of section 2 of the Companies Act,2013;
'register of companies' as defined in clause 74 of section 2 of the Companies Act,2013

Further, the company may deeming fit and possible from time to time maintain above mentioned documents in electronic form to the extent possible to ensure ease in maintenance of records and efficient utilization of space.

5. AUTHORITY AND RESPONSIBILITY

The Compliance Officer, as designated by the Board of the Company in this behalf, shall be responsible for the preservation of the records according to the time frame prescribed in the Policy for their preservation.

All staff and management of the Company shall assist in implementing this Preservation Policy as appropriate to their roles and responsibilities.

6. LOCATION OF RECORDS

As mandated by the Companies Act, 2013 or under any other statute, certain records shall be located at the registered office of the Company. The records for which no specific place has been specified under any statute shall be maintained at the corporate office of the Company or at any other place as may be approved by the Board, from time to time.

7. DISPOSAL AND DESTRUCTION OF RECORDS

Records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use, therefore disposal will aid efficiency. The records referred in Annexure B shall be preserved for at least 8 years and thereafter as per the discretion of the Board the preserved documents and records may be disposed of in the manner prescribed by it. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents. The documents may be destroyed as follows:

- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete or destroy electronically stored data.

8. REVIEW OF POLICY

This Policy shall be subject to review, if necessary. Any change / amendment in the Policy with regard to maintenance and preservation of documents and records shall be approved by the Board of Directors of the Company. This policy as amended from time to time shall be made available at the Web site of the Company.

9. EFFECTIVE DATE

This Policy shall come into effect from the date of approval of Board of Directors of the Company.

Date: 10th November, 2016

**Annexure A:**

Documents whose preservation shall be permanent in nature:

Sl. No.	Nature of Document(s)
1.	Certificate of Incorporation of Company.
2.	Certificate for commencement of business.
3.	Memorandum and Articles of Association as originally filed and updated from time to time.
4.	Agreements made by Company with Sock Exchanges, Depositories, etc.
5.	Minutes of General Meetings including meeting conducted through Postal Ballots, Board and Committee Meetings as per Companies Act, 2013.
6.	Register and Index of Members, debenture-holders, if any or other security holders if any.
7.	Register of Contracts, Charges as per Companies Act, 2013.
8.	Register of Directors and KMPs and the securities held by them.
9.	Resolutions passed by Circulation.
10.	Various Forms and returns filed with any Statutory Authorities.
11.	Certificates obtained from various Statutory Authorities
12.	Audited Financial Statements.
13.	Policies of the Company framed under various regulations
14.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

Annexure 2:

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

Sl. No.	Nature of Document(s)
1.	Books of Accounts including vouchers and bills.
2.	Annual Return(s) together with the Annexures as per Companies Act, 2013
3.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013.
4.	Register of Deposits, Inter Corporate Loans & Investments as per Companies Act, 2013.
5.	Register of Buy-back of securities from the date of completion of buy-back.
6.	Register of Transfer and Transmission of shares / Debentures and other securities.
7.	Documents relating to appointment of Managerial Personnel.
8.	All notices in form MBP-1 received from Directors and KMPs alongwith any amendment thereto.
9.	Attendance Registers, Notices, Agenda, Notes to Agenda and other related papers of the Board, Committees of the board, General meetings.
10.	Income Tax Returns filed under Income Tax Act, 1961.
11.	Scrutinizer's Report on Postal Ballot and AGM.
12.	All reports filed with the stock exchanges from time to time.
13.	Copy of newspaper advertisement or publications.
14.	All show cause notice or any other notice received from any statutory or government departments.
15.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.