

POLYGENTA TECHNOLOGIES LIMITED

Policy on Preservation of Documents

1. PREAMBLE:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Regulations"] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company. The following Policy has been approved by Board of directors of the Company at the Board Meeting held on 11th February 2016.

2. SCOPE:

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. OBJECTIVE OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same.

4. DEFINITIONS:

"Act" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

"Board of Directors" or **"Board"** means the collective body of the Directors of the Company.

"Company", **"This Company"**, **"The Company"**, wherever occur in the policy shall mean "Polygenta Technologies Limited".

"Electronic Form" means any contemporaneous electronic device such as computer, laptop, compact disc, Floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

"Maintenance" means keeping documents, either physically or in electronic form.

"Policy" or **"This Policy"** means, "Policy on Preservation of Documents".

"Preservation" means to keep the documents in good order and to prevent from being altered, damaged or destroyed.

"Register" means a register maintained under the Companies Act, 2013.

“Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

6. GUIDELINES:

In accordance with Regulation 9, the company has classified the preservation of documents to be done in the following manner:

- a. Documents that need to be preserved and retained permanently;
- b. Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;

An indicative list of the documents and the time-frame of their preservation is provided in Annexure – A.

7. MODES OF PRESERVATION:

The Documents may be preserved in

- a. Physical form; or
- b. Electronic Form

The official of the Company who is required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

8. Destruction of documents:

After the expiry of statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate / unimportant / irrelevant.

The documents may be destroyed as follows:

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

9. POLICY REVIEW:

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

10. DISSEMINATION OF POLICY

This Policy shall be hosted on the website of the Company

ANNEXURE – A

Indicative List

1. PERMANENT PRESERVATION:

- a) Common Seal,
- b) Minutes books of Board, General Meetings and Committee Meetings,
- c) Register of Loan, Guarantee, security and acquisition made by the Company
- d) Register of Investment not held in its own name
- e) Register of contracts and Related Party Transaction and Contracts and Bodies in which Directors are interested.
- f) Register of Directors / KMP.
- g) Register of Charges
- h) Scrutinizers' Report,
- i) Register of Members and Index of Members

2. DOCUMENTS TO BE MAINTAINED ATLEAST FOR EIGHT FINANCIAL YEARS:

- a) Books of Accounts together with the vouchers relevant to any entry in such books of accounts
- b) Annual Returns,
- c) Board Agenda and supporting documents,
- d) Attendance Register for Board / committee meetings,
- e) Office copies of Notice of General Meeting and related papers,
- f) Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers,
- g) All notices pertaining to disclosure of interest of directors,
- h) Instrument creating a charge or modification,
- i) Copies of Annual Returns
- j) Register of debenture holders or any other security holders, if any.
- k) Register of deposits accepted or renewed, if any.
- l) Press Releases