

## PRESERVATION OF DOCUMENT POLICY

### Introduction

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**“Listing Regulations”**), the Board of Directors (the **“Board”**) of Madhav Marbles and Granites Limited (**“MMGL”**) has adopted the Policy for Preservation of Documents, as required under applicable regulations.

### Objectives

To determine preservation period for records/documents based on their reference value and legal requirements and also ensure that the records of the company which are no longer needed or are of no value may be discarded after following the due process. The following aspects are considered while arriving at the preservation period:

- Company's own information retrieval needs (reference value)
- Statutory requirements under respective statutes.
- Litigation requirements
- To ensure easy retrieval.
- To ensure that unwanted records do not occupy storage space.

### Definitions

“Board of Directors” or “Board” shall mean the Board of Directors of the Company, as constituted from time to time.

“Company” shall mean Madhav Marbles and Granites Limited.

“Documents” shall mean all 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.

“Listing Regulations” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

### Classification of Documents

This policy sets the standards for managing, storing and preservation of documents of the Company classified in the following two categories:

- a. The documents of a permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

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- b. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in Annexure-2) 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, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

### **Authority to make alteration to the Policy**

Any director of the Company or the Company Secretary is authorized to make such alteration to this policy as considered appropriate, however, subject to the condition that such alteration shall be in consonance with the provisions of the Act and Regulations.

### **Destruction of Records**

The records/ documents preserved shall be reviewed every year or according to the need of the respective departments and actions that are needed to be taken to destroy the records which are due for disposal.

### **Suspension of Records disposal in the event of Litigation**

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, then the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed off. The company secretary shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

### **Mode of Preservation**

Records/documents may be preserved either physically or in electronic form.

### **Policy Review**

This Policy is framed based on the requirements of Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015. The Board of Directors may subject to applicable laws amend/substitute any provision(s) with a new provision(s) or replace this Policy entirely with a new policy.

In case of any subsequent changes in the Companies Act, 2013 ('the Act') or Regulations, which makes any of the provisions in the Policy inconsistent with the Act or Regulations, the provisions of the Act or Regulations would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law.

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### **Annexure 1**

#### **Documents whose preservation shall be permanent in nature**

1. Registration Certificate
2. Memorandum and Articles of the Company
3. Affidavit from the subscribers to the memorandum and from person named as the first directors
4. Statutory Registers required under applicable laws
5. Audited financial statements
6. Minutes of Board/General/Committee Meetings
7. Material Agreement/Contract
8. Order issued by Courts/Statutory Bodies
9. Any other documents as may be required to maintain permanently 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 relevant transaction**

1. Books of Accounts
2. Annual Return(s)
3. Personnel Documents
4. Insurance Policies/Claims
5. All notices pertaining to disclosure of interest of directors
6. Correspondence with Department/Shareholders
7. Non-Statutory Registers/Documents
8. Certificates surrendered to a Company
9. Instrument creating a charge or modification
10. Films, Video, CDs, DVDs, etc
11. Any other documents as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time