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# Policy on Archiving and Preservation of Documents

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# Policy on Archiving and Preservation of Documents

## 1. Introduction

In accordance with the Listing Regulations, the board of the Company, has adopted this Policy.

## 2. Definitions

- (i). “**Act**” shall mean the Companies Act, 2013 and rules made thereunder, as amended.
- (ii). “**Board**” shall mean the board of directors of the Company.
- (iii). “**Company**” shall mean Bajaj Hidusthan Sugar Limited.
- (iv). “**Documents**” refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any applicable law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.
- (v). “**Electronic Record(s)**” shall mean the electronic record as defined under Section 2(1)(t) of the Information Technology Act, 2000.
- (vi). “**Listing Regulations**” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.
- (vii). “**Insider Trading Regulations**” shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended.
- (viii). “**Policy**” shall mean this policy on archival and preservation of documents.
- (ix). “**Stock Exchange**” shall mean a recognised stock exchange on which the securities of the Company are listed.

## 3. Applicability

This Policy applies to:

1. Documents whose preservation shall be permanent in nature; and
2. Documents with preservation period of not less than 8 years after completion of relevant transactions (“**Temporary Documents**”)

All documents of the Company shall be preserved in accordance with this Policy. Any change in the governing law affecting the change in the period of preservation of documents shall prevail over this Policy.

## **4. Policy**

The following documents and information shall be preserved in the manner hereinafter stated:

### **A. DOCUMENTS AND INFORMATION THAT SHALL BE PRESERVED PERMANENTLY**

- (i). ALL DOCUMENTS INCLUDING VARIOUS E-FORMS AND INFORMATION AS ORIGINALLY FILED WITH THE REGISTRAR OF COMPANIES FOR INCORPORATION OF COMPANY UNDER COMPANIES ACT, 2013 OR ANY OTHER PREVIOUS COMPANIES ACT
- (ii). THE CERTIFICATE OF INCORPORATION AND OTHER CERTIFICATES ISSUED BY MINISTRY OF CORPORATE AFFAIRS
- (iii). MEMORANDUM AND ARTICLES OF ASSOCIATION WHETHER FILED UNDER THE COMPANIES ACT, 2013 OR ANY OTHER PREVIOUS COMPANIES ACT
- (iv). REGISTER OF RENEWED AND DUPLICATE SHARE CERTIFICATES
- (v). RECORD OF ISSUED AND CANCELLED SECURITIES CERTIFICATES
- (vi). RECORD OF PRIVATE PLACEMENT
- (vii). REGISTER OF SWEAT EQUITY
- (viii). INSTRUMENT OF TRANSFER & TRANSMISSION
- (ix). REGISTER OF EMPLOYEE STOCK OPTION
- (x). REGISTER OF BUY BACK OF SECURITIES
- (xi). REGISTER OF CHARGES
- (xii). REGISTER OF TRANSFER & TRANSMISSION OF SHARES & DEBENTURES
- (xiii). REGISTER OF MEMBERS AND INDEX OF MEMBERS
- (xiv). REGISTER OF RECORDS AND DOCUMENTS DESTROYED
- (xv). FOREIGN REGISTER CONTAINING THE NAMES AND PARTICULARS OF: – MEMBERS OR DEBENTURE HOLDERS OR SECURITY HOLDERS OR BENEFICIAL OWNERS RESIDING OUTSIDE INDIA
- (xvi). REGISTER OF DIRECTORS & KEY MANAGERIAL PERSONNEL & THEIR SHAREHOLDINGS
- (xvii). REGISTER OF LOANS, INVESTMENTS AND GUARANTEES
- (xviii). REGISTER OF INVESTMENTS MADE BY A COMPANY NOT HELD IN ITS NAME
- (xix). REGISTER OF CONTRACTS OR ARRANGEMENTS IN WHICH DIRECTORS ARE INTERESTED
- (xx). MINUTES OF GENERAL MEETINGS, CREDITORS MEETINGS, BOARD MEETINGS & COMMITTEE MEETINGS
- (xxi). REGISTER OF DOCUMENTS EXECUTED UNDER COMMON SEAL OF THE COMPANY
- (xxii). DISCLOSURE UNDER SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011
- (xxiii). LEGAL DOCUMENTS INCLUDING BUT NOT LIMITED TO CONTRACTS, LEGAL OPINIONS, PLEADINGS, ORDERS PASSED BY THE COURT OR

TRIBUNAL, JUDGEMENTS, INTERIM ORDERS, DOCUMENTS RELATING TO CASES PENDING IN ANY COURT OR TRIBUNAL OR ANY OTHER AUTHORITY EMPOWERED TO GIVE DECISION ON ANY MATTER, AWARDS, DOCUMENTS RELATING TO PROPERTY MATTERS

**B. DOCUMENTS AND INFORMATION THAT SHALL BE PRESERVED FOR NOT LESS THAN 8 YEARS AFTER COMPLETION OF RELEVANT TRANSACTIONS**

- (i). ANNUAL RETURNS
- (ii). REGISTER OF INVESTOR COMPLAINTS
- (iii). ATTENDANCE REGISTER – BOARD AND COMMITTEE MEETINGS
- (iv). BOOKS OF ACCOUNTS
- (v). REGISTER OF PROXIES
- (vi). REGISTER OF INSPECTION
- (vii). NOTICES PERTAINING TO DISCLOSURE OF INTEREST BY THE DIRECTORS
- (viii). OFFICE COPIES OF NOTICES, AGENDA, NOTES ON AGENDA AND OTHER RELATED PAPERS
- (ix). POSTAL BALLOT FORMS
- (x). REGISTER OF ALLOTMENT
- (xi). DIVIDEND CHEQUES OR WARRANTS RETURNED BY THE BANK, AFTER PAYMENT THEREOF, AND THE DIVIDEND REGISTERS
- (xii). REGISTER OF DEPOSITS (FOR NOT LESS THAN 8 YEARS FROM THE DATE OF LAST ENTRY IN THE REGISTER)
- (xiii). SCRUTINIZER’S REPORTS ON VOTING AT GENERAL MEETING/POSTAL BALLOT
- (xiv). REGISTER AND INDEX OF DEBENTURE HOLDERS & OTHER SECURITIES (TO BE PRESERVED FOR 8 YEARS FROM THE DATE OF REDEMPTION OF DEBENTURES.)
- (xv). CERTIFICATE & REPORTS RECEIVED FROM SECRETARIAL AUDITORS
- (xvi). ANNUAL REPORTS
- (xvii). REPLIES TO SHOW CAUSE NOTICES, IF ANY ETC.
- (xviii). CONTRACT OF EMPLOYMENT WITH MANAGING OR WHOLE-TIME DIRECTOR(S)
- (xix). DISCLOSURES UNDER SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015 & REGISTERS MAINTAINED THEREIN

**C. ARCHIVAL OF DOCUMENTS**

The Company shall disclose on its website all such events or information (“Disclosures”) which are required to be disclosed to the stock exchanges under Listing Regulations.

The Disclosures made to the Stock Exchanges shall be hosted on the Company's website for a period of five years from the date of initial posting.

The Disclosures shall thereafter be archived under the heading "Archives" and shall be retained on the Company's website for three years. Thereafter the said information, documents, records may be destroyed.

#### **D. CUSTODY OF DOCUMENTS**

All such employees of the Company, as the management may deem fit, shall be responsible for custody of the documents that are handled by them and their reportees and should ensure compliance with this Policy.

#### **E. MODE OF MAINTENANCE**

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to.

All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time in accordance with applicable law.

#### **F. DISPOSAL AND DESTRUCTION OF RECORDS**

After the expiry of the statutory retention period, the preserved documents may be destroyed. The Compliance Officer may direct the employees who are in charge, from time to time, to destroy the documents which are no longer required as per the list specified above. A register of documents disposed off/ destroyed shall be maintained. It shall state the brief of the documents destroyed, date of disposal/ destruction and the mode of destruction. The entries in the register shall be authenticated by a person authorized by the Company.

#### **G. SUSPENSION OF DISPOSAL OF DOCUMENTS IN THE EVENT OF LITIGATION OR CLAIMS**

In the event that the Company is served with a notice for providing documents from a regulatory, statutory or governmental authority or any litigation proceedings are commenced by or against the Company, the disposal of documents that are subject matter of such notice, or litigation shall be suspended until the matter is settled, resolved or disposed off. The Compliance officer shall immediately inform all concerned employees of the Company about such suspension of disposal of documents.

## **5. Communication of this Policy**

The Policy shall be explained to all such employees, who have joined the Company, which the management may deem fit and directors as a part of the induction programme along with other HR related policies. For the existing employees/ directors of the Company, the concerned heads of department will apprise the respective employees reporting to them.

## **6. Policy Review and Amendments**

The Board reserves the power to review and amend this Policy from time to time. All provisions of this Policy would be subject to revision or amendment in accordance with applicable law. In case of any amendment(s), clarification(s), circular(s) etc. issued by any governmental, statutory or regulatory authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder.

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