ASHNOOR TEXTILE MILLS LIMITED POLICY FOR PRESERVATION OF DOCUMENTS

PURSUANT TO CLAUSE 9 OF SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015

1. INTRODUCTION:

Pursuant to Regulation 9 of the Listing Regulations the Board of Directors of Company is require to frame a policy for providing framework for adequate protection and preservation of the documents of the Company as per the applicable statutory requirements. Accordingly, the Board of Directors of the Company has adopted this policy effective from December 1, 2015 and which may be amended from time to time as the Board may deem fit and/or to incorporate any subsequent amendment(s)/ modification(s) in the Listing Regulations or Applicable Law with respect to matters covered under this Policy or otherwise.

2. MEANINGS OF TERMS USED IN THE POLICY:

- <u>"Act"</u> means the Companies Act, 2013 including the rules, schedules, clarifications and guidelines issued by the Ministry of Corporate Affairs from time to time;
- <u>"Applicable Law"</u> means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and Institute of Company Secretaries of India under which preservation of the documents have been prescribed;
- ➤ <u>"Board"</u> refers to the Board of Directors of Ashnoor Textile Mills Limited;
- "Company" refers to Ashnoor Textile Mills Limited pursuant to this policy, having its Registered Office at Village Khandsa, Behrampur Road, District Gurgaon, Haryana-122001
- <u>"Listing Regulations"</u> means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- "Stock Exchange" means Bombay Stock Exchange;

3. PRESERVATION OF DOCUMENTS:

- ➤ The Documents those are required to be maintained under Applicable Law shall be maintained and preserved as per the provisions content therein.
- The Documents shall be preserved for time specified in Applicable Law.
- ➤ Head of the Department for which Documents relate shall be responsible to keep the Documents preserved.
- ➤ Departmental Head shall update list of Documents to be preserved and preservation time schedule from time to time to ensure that these are in compliance with the Applicable Law and shall communicate any changes desired in the abovementioned Schedule to the Company Secretary.
- In case of any inconsistency in the Documents Preservation Schedule and the Applicable Law to the Company, provisions of Applicable Law shall prevail.
- ➤ The documents mentioned above can be maintained by the Company in physical or electronic or any other digital mode, if permitted under the Applicable Law.
- > The concerned head of department shall keep in his custody the documents which are of important and/or confidential nature and list of the same shall be maintained in a Register.
- The said documents along with the Register shall be handed over by Departmental Head to the successor in the event of such head of department leaving the Company/Department.
- Detailed list of documents to be preserved along with Preservation Time Schedule is given below:

Serial Number	Type of Document	Preservation Period	Concerned Department
1.	Common Seal	Permanent	Secretarial
2.	Certificate of Incorporation, Commencement of Business and Certificate of Change in Name	Permanent	Secretarial
3.	Statutory Registers	Permanent	Secretarial
4.	Forms Deposited with Registrar of Companies	Permanent	Secretarial
5.	Annual Reports	Permanent	Secretarial
6.	Office copies of Notice of Board Meetings, Committee Meetings along with Agenda and Notes to Agenda and other related papers	8 years	Secretarial
7.	Office copies of Notice of General Meetings and other related papers	8 years	Secretarial
8.	Minutes Books of Board Meetings, Committee Meetings and General Meetings	Permanent	Secretarial
9.	Scrutinizers Reports	Permanent	Secretarial
10	Annual Audit Reports and Financial Statements	Permanent	Secretarial
11.	Attendance Register for Board and Committee Meetings	8 years	Secretarial
12.	Insurance Policies	8 years	Finance and Accounts
13.	Tax Exemption and Related Documents	Permanent	Finance and Accounts
14.	Bank Statements	8 years	Finance and Accounts
15.	Investment Records	8 years	Finance and Accounts
16.	Journal Entry Support Data	8 years	Finance and Accounts
17.	Books of Accounts, Ledger and vouchers	8 years*	Finance and Accounts
18.	Excise Records	8 years*	Finance and Accounts
19.	Tax Deducted at Source Records	8 years*	Finance and Accounts
20.	Income Tax Records	8 years*	Finance and Accounts
21.	Service Tax Records	8 years*	Finance and Accounts

22.	Custom Department's Records	8 years*	Finance and Accounts
23.	VAT Records	8 years*	Finance and Accounts
24.	Courts Order	Permanent	Legal
25.	Original Property Purchase and Sale Agreement	Permanent	Legal
26.	Property ownership records issued by the Government Authority	Permanent	Legal
27.	Legal Memorandum and opinion including subject matter files, if any		Legal
28.	Litigation Files	4 years from the closure of litigation	Legal
29.	Compliance records of Labour Law	As required in relevant law	Human Resources

^{*8} years from the end of financial year or completion of assessment under applicable law is over whichever is later

DESTRUCTION OF DOCUMENTS:

After the expiry of the preservation period specified as above such documents which are no longer required may be destroyed by the concerned department after obtaining prior approval of the Board of the Company. The records of the documents destroyed shall be maintained by the concerned department in flowing format and shall be produced whenever required by the concerned authority/auditors:

Particular of Documents	
Provisions of Applicable Law	
Date of Destruction	
Mode of Destruction	
Name and initial of Authorized Person	
Name and initial of person before whom record is	
destroyed	

In case any specific procedure is prescribed under Applicable Law for destruction of the documents, the Company shall follow the same.

Where the Company has been served with any Notice requisitioning documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed off finally.

STORAGE OF DOCUMENTS:

Documents mentioned above which are not required regularly can be stored by the concerned department in secured place or cupboard having access only by the authorized personnel. All documents should be boxed and the box should be labeled with the reference number and list of the files/documents. List of documents contained in the box should be kept inside the Box

and shall also be kept by the concerned department. Electronic records i.e. e-mail files etc. should be stored as per IT Policy of the Company.

DISCLOSURES:

The Company shall disclose this Policy on its website and a web link thereto shall be provided in the Annual Report.

Place: Gurgaon, Haryana Date: January 28, 2106
