

# KANT & COMPANY LIMITED

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## POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

### 1. Preamble

A policy on preservation of documents would ensure safe-keeping of the records and safeguard the documents from getting manhandled, while at the same time avoiding unessential inventory of documents. The Company, therefore, makes this policy, in pursuance to Regulation 9 read with Regulation 30(8) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations"), on preservation of the documents to aid the employees/Management/Company in handling the documents efficiently whether in physical form or in electronic form. It not only covers the various aspects on preservation of the documents, but also the safe disposal/destruction of the documents.

### 2. Definitions

- 2.1 "*Act*" means the Companies Act, 2013.
- 2.2 "*Applicable Law*" means any law, rules, circulars, guidelines or standards under which the preservation of the Documents has been prescribed.
- 2.3 "*Authorised Person*" means any person duly authorised by the Board, Managing Director, Whole Time Director, General Manager or any other officer of the Company based on the delegation of the authority by the aforesaid person and who is entrusted with the responsibility of maintenance and preservation of Documents.
- 2.4 "*Authority*" means any statutory, administrative, arbitral and/ or judicial Authority.
- 2.5 "*Archival*" means accumulation of documents in digital mode that has been selected for long-term preservation on grounds of their legal, commercial, cultural, historical or evidentiary value.
- 2.6 "*Board*" means the Board of directors of the Company or its Committee.
- 2.7 "*Company*" means '**Kant & Company Limited**'
- 2.8 "*Competent Officer*" means any officer or employee or Head of the Department(s) of the Company based on the delegation of the authority by the Authorised Person and

who is entrusted with the responsibility of maintenance and preservation of documents.

2.9 "*Current Document(s)*" means any document, that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.

2.10 "*Document(s)*" refers to documents, writings, papers, notes, agreements, deeds, contracts, summons, notices, advertisements, requisitions, orders, declarations, forms, correspondence with Authorities, minutes, indices, registers and or any other record/s, required to be maintained 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 / print form or in Electronic Form and does not include multiple or identical copies.

2.11 "*Electronic Record(s)*" means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

2.12 "*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.

2.13 "*Maintenance*" means keeping Documents, either physically or in Electronic Form.

2.14 "*Offer Document*" means any document provided or issued with respect to invitation for subscription of Securities of the Company including but not limited to by way of public offer, private placement, preferential issue, rights issue, ESOP.

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

2.16 "*Regulations*" means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

### **3. Coverage**

This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal as well as their Archival.

### **4. Classification**

The preservation of Documents shall be done in the following manner:

- a) Where the Documents are required to be preserved permanently in terms of Applicable Law, the same shall be preserved permanently;
- b) Where the Documents are required to be preserved for a specified period such as eight years or so as prescribed by Applicable Law, the same shall be preserved for such specified period required by Applicable Law;
- c) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is "Current";
- d) In case of any other Document, for such period, as a competent officer of the Company required to handle or deal with the Document takes a considered view about its relevance.

## **5. Modes of preservation**

5.1 The Documents may be preserved in

- 5.1.1 Physical form or ;
- 5.1.2 Electronic Form.

5.2 The Competent Officer who is required to preserve the Documents is generally expected to observe the compliance of requirements of Applicable Law;

5.3 The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents;

## **6. Custody of the Documents**

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Compact Disc, other storage devices or such other Documents and devices in his possession under the Policy to such person as the Authorised Person/ and or Competent Officer may authorise for the time being.

## **7. Authority for approval of Policy**

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted *via* the Regulations.

## **8. Authority to make alterations to the Policy**

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Regulations and Applicable Law.

## **9. Destruction of Documents**

9.1 Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents.

9.2 The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, subject to the provisions under the Applicable Law.

## **10. Archiving of Documents which are hosted on the Company's website**

Recognizing the need to ensure the preservation and availability of the Documents of the Company after their required regulatory preservation period, for any legal, administrative, and historical purposes, the Company adopts the following archival policy in respect of Documents which are hosted on the website of the Company:-

- 10.1. All Documents generated, disclosed or received by the Company, on its website, for the purpose of shareholder communication, are the properties of the Company and constitute archival material.
- 10.2. Archival material of the Company shall not be destroyed or purged without the approval of the Authorised Person.

Provided that nothing contained herein shall be deemed to lead to an exception in case of an accidental deletion, or deletion due to any system flaw, virus, or any other deletion, inaccessibility or loss due to any reason other than deliberate and determinate deletion.

- 10.3. Material so selected for preservation shall be sent to the Company archives in the category of [Libraries].

The Authorised Person, acting in accordance with the Policy and based on instructions given by the Managing Director or Whole time Director or Manager will be responsible for deciding how long archival material is to be retained in and under the direct control of the officer concerned. The period shall be 3 years.

- 10.4. Documents under the Regulations which are not required to be filed with Stock Exchange or any other Regulatory Authority may be preserved for a reasonable period of time which shall not be less than 3 years or more considering the relevance or importance of the same as may be decided by the Authorised Person subject to intimation to the Managing Director/Board.
- 10.5. With reference to the pretext, the Documents submitted to the Stock Exchange, to be hosted on the website for the purpose of compliance with disclosure norms shall also be archived.
  - a. Archiving of the Documents to be submitted to the Stock Exchange, in terms of the Regulations, shall be done after the lapse of the preservation period of 5 years as per the archival policy;
  - b. For the Documents to be submitted to the Stock Exchange to comply with disclosure norms as required by any other Applicable Law, the Documents are to be archived after the lapse of the specified/required time period.

## **11. Conversion of the form in which the Documents are preserved**

- 11.1. The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space;
- 11.2. Subject to compliance of the Applicable Laws, this will be done after obtaining prior approval of the Board or any other person authorised by the Board.

## **12. Authenticity**

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

## **13. Interpretation**

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.

**The above policy was adopted in the Board at its meeting held on January 28, 2016.**