

PROLOGUE:

*Pursuant to the Regulation 9 and 30 (8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR"), the Every listed entity has to put in place a policy for preservation of documents, approved by its board of directors and determine the period of record keeping and preservation of the physical and electronic records of the Company.*

*Produced here below is the "Policy on Documents Retention" of the Company in compliance with the regulation 9 and 30 (8) of LODR. The said policy is approved and adopted by the Board of directors of the Company in their meeting held on 30<sup>th</sup> October, 2015 to ensure that the Company maintains both electronic and paper documents which are bound by the legislative requirements and are subject to the same degree of confidentiality and care.*

**1. OBJECTIVE :**

The objective of the policy is

1. systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business.
2. to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed
3. to determine the period of record keeping and preservation of the physical as well as electronic records of the Company.

**2. DEFINITIONS:**

- 2.1 "Preservation" is maintenance of documents, files and records in usable form.
- 2.2 "Records" means recording of information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.
- 2.3 "Record Keeping" means making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.
- 2.4 "Company" means Haldyn Glass Limited.
- 2.5 "Board of Directors" or "Board" means the Board of Directors of Haldyn Glass Limited, as constituted from time to time.
- 2.6 "Listing Regulations" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- 2.7 "Documents" refer to notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, papers or any other record, required under or in order to comply or whether issued, sent, received or kept with the requirements of the Companies Act, 2013 and rules made thereunder and SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, SEBI (Prohibition of Insider Trading) Regulations, 2015 or any other SEBI regulations, for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

**3. COVERAGE:**

This policy is intended to guide the Officers of the Company Secretarial Department for the maintenance of Documents relating to the Compliances made by the Company under the said LODR, any other SEBI Regulations and the Companies Act, 2013 and Rules made thereunder, as amended time to time.

**4. CLASSIFICATION OF DOCUMENTS**

The documents which are required to retain under this policy, are classified in to following two categories-

- (a) documents whose preservation shall be permanent in nature ;
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions:

**5. MAINTENANCE OF DOCUMENTS**

**5.1 Mode of Maintenance:**

The documents may be maintained in:

- a. Physical Form
- b. Electronic Form

**5.2 Manner of Maintenance:**

- a. The content and essential characteristics of Electronic documents must remain unchanged through preservation.
- b. Electronic documents can be maintained in forms such as emails, web pages or database records, pdf versions, plus scanned versions of paper records.
- c. Physical documents to be maintained in books and files.
- d. The Physical documents as preserved may be converted, whenever require or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space, subject to the approval of the Company Secretary.
- e. All Electronic and Physical documents to be saved at the registered office or any other office as may be approved by the Board of the Company and no physical documents can be migrated without permission of Company Secretary.

6. DESTRUCTION AND DISPOSAL OF DOCUMENT

All documents as mentioned in Annexure A which are required to be preserved for not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed. However, all records mentioned in Annexure B need to be preserved by the Company permanently during the entire life of the Company. Utmost care is to be taken to ensure that files are neither prematurely destroyed nor kept for period longer than necessary.

A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction. The entries in the register shall be authenticated by the Company Secretary.

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**Annexure A**  
**Documents that need to be preserved for 8 years**

1. Annual Reports.
2. Minutes book of Board Meeting and Various committees.
3. Circular Resolution.
4. Consent and Resignation Letters received from the Directors
5. Application to Central Government, Regional Director, Registrar of Companies or any other statutory authority and Approvals received thereof.
6. NSDL/CDSL Files.
7. Annual financial statements including Annual accounts, Directors report and Auditor's report.
8. Declaration by directors under section 164 of the Companies Act, 2013.
9. Declaration by directors under section 184 of the Companies Act, 2013.
10. All documents under the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015.
11. Disclosures made under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, SEBI (Prohibition of Insider Trading) Regulations, 2015.
12. Notice of General Meetings and Board Meetings.
13. Documents on which the common seal of the company has been affixed.
14. Advertisements published.
15. Inward file giving information about the various correspondence received from outside agencies requiring secretarial action.
16. Attendance Record and Proxy Forms for General meeting.

**Annexure B**  
**Documents that need to be preserved Permanently**

1. Certificate of Incorporation
2. Certificate of change of Name
3. Memorandum and Article of Association as amended time to time
4. Licenses issued by various Regulatory authority.
5. Minutes Book of General Meeting.
6. Statutory Register of Members
7. Statutory Register of Charges