

Draft

FILATEX INDIA LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

**[Pursuant to Regulation 9 of the Securities
and Exchange Board of India (Listing
Obligations and Disclosure Requirements)
Regulations, 2015]**

1. **Preamble**

The Securities and Exchange Board of India (SEBI) has notified Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations) on 2nd September 2015 which will be effective from 1st December 2015. This Policy has been framed in accordance with the requirements of Regulation 9 of the said Listing Regulations for preservation of Documents/Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”).

The purpose of this Policy is to ensure that all necessary documents of the Company are adequately protected and maintained/preserved as per the statutory and regulatory requirements. Further, documents of the Company which are no longer needed may be destroyed after following due process in this regard. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents.

2. **Definitions**

Unless the context otherwise requires, the words, terms, expressions and derivations used in this Policy shall have the meaning given in the Listing Regulations, Companies Act, 2013 or any other Act(s), Rules and Regulations mentioned in this Policy:

- (a) **“Board of Directors”** or **“Board”** means the Board of Directors of Filatex India Limited (including duly authorized Committee thereof), as constituted from time to time.
- (b) **“Company”** means Filatex India Limited.
- (c) **“Companies Act”** means Companies Act, 2013 and rules made thereunder.
- (d) **“Policy”** means Policy on Preservation of Documents of the Company.
- (e) **“SEBI Takeover Regulations”** means SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time.
- (f) **“SEBI Insider Trading Regulations”** means SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.
- (g) **“SEBI ICDR Regulations”** means SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009, as amended from time to time.
- (h) **“Stock Exchange”** means a recognized stock exchange as defined under clause (f) of section 2 of the Securities Contracts (Regulation) Act, 1956, on which the securities of the Company are listed for the time being.

3. Scope

This Policy covers preservation of documents maintained by the Company under various provisions of the Companies Act, Listing Regulations, SEBI Takeover Regulations, SEBI Insider Trading Regulations and other applicable SEBI Rules and Regulations including but not limited to SEBI ICDR Regulations and any other laws/rules/regulations applicable to the Company from time to time.

4. Preservation Period

Based on the various provisions contained under the Companies Act, Listing Regulations and other applicable laws/rules/regulations of the Statutory Authorities, the Company has classified its various documents in the following two broad 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.

4.1 Documents to be preserved permanently includes:

Sl. No	Particulars	Provisions in law, if any	Responsibility
1	Register of loans, guarantee, security and acquisition made by the Company	Section 186 of the Companies Act	Secretarial Deptt.
2	Register of investments not held in the name of the Company	Section 187 of the Companies Act	Secretarial Deptt.
3	Register(s) of contracts or arrangements in which Directors are interested	Section 189 of the Companies Act	Secretarial Deptt.
4	Register of Charges	Section 85 of the Companies Act	Secretarial Deptt.
5	Register of Members including an index of the names	Section 88 of the Companies Act	Secretarial Deptt./RTA
6	Register of Renewed and Duplicate Share Certificates	Section 46 of the Companies Act	Secretarial Deptt.
7	Minutes of the General Meetings and resolutions passed by postal ballot	Section 118 of the Companies Act	Secretarial Deptt.
8	Minutes of the meetings of the Board and Committees thereof	Section 118 of the Companies Act	Secretarial Deptt.

4.2 Documents to be preserved for not less than 8 years after completion of the relevant transactions includes:

Sl. No	Particulars	Provisions in law, if any	Responsibility
1	Books of Account and other related papers as per Companies Act	Section 128 of the Companies Act	Finance and Accounts Deptt.
2	Disclosures/Notices of interest of Directors	Section 184 of the Companies Act	Secretarial Deptt.
3	Documents relating to Public Deposits	Section 73 of the	Secretarial

	including Register of Deposits	Companies Act	Deptt.
4	Instrument of creation/ modification/ satisfaction of charges from the date of satisfaction of Charge	Section 85 of the Companies Act	Secretarial Deptt.
5	Register of Debenture Holders/Register of any other Security Holders and their respective Index of the names, from the date of full redemption of such debentures/other securities	Section 88 of the Companies Act	Secretarial Deptt.
6	Annual return and copies of all certificates and documents required to be annexed thereto	Section 92 of the Companies Act	Secretarial Deptt.
7	Attendance Register(s) of the meetings of the Board and Committees thereof	Secretarial Standard on Meetings of the Board of Directors	Secretarial Deptt.
8	License(s), Ownership records issued by Government Authorities and Court Orders	-	Concerned Deptt.
9	Press Releases/Public filings made or Disclosures/correspondence made/received or any clarification given by the Company from time to time under the Listing Regulations, SEBI ICDR Regulations, SEBI Takeover Regulations, SEBI Insider Trading Regulations, Companies Act and other law/rules/regulations, as applicable	-	Secretarial Deptt./ Concerned Deptt.
10	Register of Directors and Key Managerial Personnel and their shareholding	Section 170 of the Companies Act	Secretarial Deptt.

4.3 Others:

Sl. No	Particulars	Provisions in law, if any	Responsibility
1	Material events or information which has been disclosed to the stock exchanges under Regulation 30 of the Listing Regulations	To be hosted on the website of the Company for a minimum period of 5 years	Secretarial Deptt.
2	Disclosures under SEBI Insider Regulations	Minimum period of 5 years	Secretarial Deptt.

5. Register of documents destroyed

Respective Heads of Department responsible for preservation of relevant documents may destroy such documents, which are no longer required as per this Policy, after entering the same in the Register of Destruction maintained for the purpose.

6. Power to amend the Policy

The Policy may be amended from time to time by the Board.

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