

VINAYAK VANIJYA LIMITED
POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL
OF DOCUMENTS IN THE WEBSITE

[Under Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

The Securities market regulator- Securities and Exchange Board of India (SEBI) wide its notification issued on 2nd September, 2015 has repealed the clauses under Listing Agreement entered into by the Companies with the Stock Exchange(s) and has put in place Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 to come into force from the 90th day from the date of publication in the Official Gazette (i.e. from 1st December, 2015).

Preamble:

This policy attempts to preserve and maintain records of the organization. During the course of business, the Company generates several records either in physical or in electronic modes, most of the records are useful for a shorter span of time, hence such records are kept for a definite period of time, but some records may be needed to be kept permanently during the lifetime of the organization. In order to preserve such records, the Company needs to implement a well-considered, well-documented plan in order to ensure that they remain trustworthy and useful over a period of time.

Purpose of the policy:

The purpose of this policy is to establish the framework needed for effective management of the records at the Company and also set principles for underlying the Company's approach to preservation of its records. In order to efficiently conduct its business, the storage, retrieval and management of these information reserves of the Company is a significant issue.

A good record keeping program is fundamental to the Company's commitment to administrative transparency and accountability. It enables the Company to account for decisions and actions by providing essential evidence in the form of records and ensures the preservation of the collective memory of the Company.

The Company is concerned with all aspects of its record keeping independent of the technological medium. This policy seeks to ensure that the Company's business is adequately documented through the creation of records that are then managed in accordance with best practice.

Preservation of records is the responsibility of all staff & users of archives and records of the Company. Responsibility is to ensure the continuous availability and authenticity of the records.

Scope:

This policy is applicable to the Company and all the departments in the Company. The policy ensures 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. Therefore, the records must be kept keeping in mind the confidentiality and nature of the document.



Definitions:

"Preservation" is maintenance of documents, files and records in usable form.

"Records" means recording of information in any form including data in computer systems, created or retrieved and maintained by an organization or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

"Record keeping" means making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.

"Company" means Vinayak Vanijya Limited.

"Board of Directors" or "Board" means the Board of Directors of Vinayak Vanijya Limited, as constituted from time to time.

"Policy" means policy on Preservation of records.

"Storage Options" means:-

Online storage:

Records are kept on a server or hard drive and are immediately available for use over a network. This option is best for records that must be accessed frequently.

Near-line storage:

Records are stored on media such as optical disks in jukeboxes or tapes in automated libraries which are attached to a network. Because retrieval is slower than with online storage, this option is most appropriate for records that are accessed occasionally.

Offline storage:

Records are stored on removable media and must be manually retrieved. This option provides the slowest access and should be used for records that are only rarely needed.

"Listing Regulations" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Policy:

a) LEGISLATIVE FRAMEWORK AND STANDARDS

- Companies (Preservation and Disposal of Records) Rules, 1966.
- Companies Act, 2013.
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

b) RESPONSIBILITY OF RECORD KEEPING

• MANAGERS

Management-level staff is responsible for implementing and maintaining sound record keeping practices within their respective administrative units. Managers must ensure that records are



created, maintained and stored in accordance with the standards outlined in this policy, and that no records are destroyed before their prescribed time limit.

• **STAFF**

Every member of staff is responsible for making and keeping such records as may be necessary to fully and accurately record the functions, activities, transactions, operations, policies, decisions, procedures, affairs, administration and management of the Company. Staff members are to handle records sensibly and with care and respect so as to avoid damage to the records and prolong their life-span.

c) CREATION OF RECORDS

• In accordance with this policy, all staff is required to create full and accurate records which adequately document the business activities in which they take part.

Records should be full and accurate to the extent necessary to:

- i. facilitate action by employees, at any level, and by their successors;
- ii. make possible a proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;
- iii. protect the financial, legal and other rights of the organization, its clients and any other people affected by its actions and decisions.

d) MAINTAINENCE OF RECORDS

- The content and essential characteristics of digital records must remain unchanged through preservation.
- Digital records can be maintained in forms such as emails, web pages or database records, plus scanned versions of paper records that have been digitized in business processes.
- Physical records to be maintained in books and files.
- All digital and physical records to be saved at the registered office or any other office as may be approved by the Board of the Company and no physical records can be migrated without permission of Company Secretary.
- A reproduction of any original record on microfilm or on any other medium shall be certified by a Director or the Company Secretary of the Company to be a true and accurate reproduction of the original of such record.

e) DISPOSAL AND DESTRUCTION OF RECORDS

- All records mentioned in **Annexure A** which are temporary in nature must 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. **Annexure C** stating the Documents whose preservation shall be for a minimum period of three years after completion of the event.



- The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Secretary or such other person as may be authorized by the Board for the purpose. Inspection of this register is restricted.

f) DISCLOSURE:

This Policy will be communicated to all operational employees and other concerned persons of the Company and be disclosed on the Company's website www.vinayakvanijya.com

Policy applies to	The Company, The Board of Directors, Key Managerial Personnel, all employee levels and support staff
Approving Authority	Board of Directors
Officer responsible	Compliance Officer of the Company
Approval Date:	17.04.2017 and shall remain valid until such time it is modified/amended/alterd by the Board.
Effective Date	17.04.2017
Date of Last Revision	Not Applicable
Contact Officer	Compliance Officer

A. Documents whose preservation shall be permanent in nature:

1. Property records including purchase and sale deeds, licences, copyrights, patents & Trademarks
2. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records
3. Personal files of all live employees
4. Any other record as may be decided by the Board of Directors of the Company from time to time.
5. Intellectual Property Documents shall include, but shall not be limited to copyrights, Trademarks, Patents, and Industrial Design, Intellectual Property Rights documents that are owned by the Company shall be retained by the Company permanently.

B. Documents whose preservation shall be for at least eight years:

1. Books of Accounts, Bank Statements and vouchers
2. Filings with Stock Exchanges, Registrar of Companies and other statutory authorities.
3. Payroll Records, Employee deduction authorizations, attendance records, employee medical records, leave records, Pension and retiral related Records, etc.
4. Corporate Social Responsibility Records
5. Sponsorship Projects Records



6. Correspondence and Internal Memoranda
7. Any other record as may be decided by the Board of Directors of the Company from time to time.
8. Register of deposits for each branch and a consolidated
9. Necessary records of transactions from the date of cessation of transaction between the NBFCs and the client.

C. Documents whose preservation shall be for a minimum period of three years after completion of the event:

1. Tender Documents
2. Lease Deeds and Contracts
3. Legal files
4. Insurance Records including policies and claims
5. All e-mail correspondence, internal & external

6. Documents under Secretarial Standards:

- Proof of sending Notice of the meetings of the Board / Committee and General meetings and its delivery
- Proof of sending Agenda and Notes on Agenda and their delivery
- Proof of sending and delivery of the draft of the Resolution
- Proof of sending draft Minutes and its delivery
- Proof of sending signed Minutes and its delivery

7. Any other record as may be decided by the Board of Directors of the Company from time to time.

