

TAPARIA TOOLS LTD.

POLICY ON PRESERVATION OF DOCUMENTS

Reg. Office:
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Trimbak Road,
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CIN: L99999MH1965PLC013392

TAPARIA TOOLS LTD.

Policy on Preservation of Documents

1. Preamble

This policy will be called “Preservation of Documents Policy” of Taparia Tools Limited (hereinafter called as “the Company”).

This policy has been framed in compliance with the provisions of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Regulations”).

2. Scope

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

It applies to all departments and business functions of the Company but does not apply to personal or non-business information.

3. Objectives

The main objective of this policy is to ensure that all statutory documents are preserved in compliance with Regulations and as per policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

Thus this policy aims to provide efficient and systematic control on the periodicity and destruction of business related documents.

4. Definitions

The terms used in this policy shall have meaning ascribed to such terms in the Companies Act, 2013, rules made thereunder and the Listing Regulations (collectively, the Statutory Provisions), as the case may be.

For the purpose of this Policy, “**Document**” means document maintained in any medium, (paper, electronic, optical, magnetic, etc.), that is created, received, transmitted or used in the course of and in relation to the business of the Company.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

5. Guidelines

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows-

- a. Documents whose preservation shall be permanent in nature;

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- b. Documents with preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. Documents that needs to be preserved and retained permanently;
- b. Documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;
- c. Documents that need to be preserved and retained for such period as prescribed under any statue or regulation as applicable to the Company.
- d. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is "Current".

An indicative list of the documents and the time-frame of their preservation is provided in **Annexure-A**.

6. Modes of Preservation

The documents may be prescribed in

- a. Physical Form or
- b. Electronic Form

The official of the Company who is required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

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.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

7. Destruction of documents

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure A** may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given in **Annexure A**. The details of the documents destroyed by the Company shall be kept by Employees who are disposing of the documents in the format prescribed at **Annexure B**. The entries in the register shall be authenticated by the Authorised Person.

8. Policy Review

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The CS/CFO will keep the policy updated as per applicable statutory guidelines.

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9. Amendment

The board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s)/amendment(s) to Regulation.

ANNEXURE-A

Indicative list

A) PERMANENT PRESERVATION:

- a. Common Seal
- b. Minutes books of Board, General Meetings and Committee Meetings
- c. Statutory Registers
- d. Licence and Permissions
- e. Statutory Forms and disclosures except for routine compliance
- f. Scrutinizer's Report
- g. Register of Members
- h. Index of Members

B) TEMPORARY PRESERVATION UPTO 8 YEARS:

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. Office copies of Notice of General Meeting and related papers
- e. Office copies of Notice of Board Meeting/ Committee Meeting, Notes on Agenda and other related papers
- f. All notices pertaining to disclosure of interest of directors
- g. Instrument creating a charge or modification
- h. Books of accounts, financial statements, etc.
- i. Register of debenture holders or any other security holders

C) OTHERS:

As per applicable law

ANNEXURE-B

Specimen format of the register of documents disposed off /destroyed

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON