

**NAVA BHARAT VENTURES LIMITED  
HYDERABAD**

**POLICY ON PRESERVATION OF THE DOCUMENTS**

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

*[As approved by the Board of Directors of the Company]*

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**I. SCOPE:**

The Policy on preservation of Documents would ensure safe-keeping of the records and safeguard the Documents in pursuance of Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations") on preservation of the Documents to aid the employees in handling the Documents efficiently.

It applies to all "Documents", "books and papers" which include books of account, deeds, vouchers, writings, documents, minutes and registers or any other information, maintained on paper or in electronic form.

The object of the Policy is to ensure that the books, papers and Documents remain accessible at all times so as to be usable for subsequent reference.

The books of account and other relevant books and papers shall be retained completely in the format in which they were originally generated, sent or received, or in a format which shall present accurately the information generated, sent or received and the information contained in the electronic records shall remain complete and unaltered.

The information received from branch offices shall not be altered and shall be kept in a manner where it shall depict what was originally received from the branches.

The information in the electronic record of the document shall be capable of being displayed in a legible form.

Every Head of Department and Unit Heads shall ensure a proper system for storage, retrieval, display or printout of the electronic records subject to such terms and restrictions as the Audit Committee or the Board of Directors may deem appropriate and such records shall not be disposed of or rendered unusable, unless permitted by law.

Provided that the back-up of the books of account and other books and papers of the Company maintained in electronic mode shall be kept in servers physically located in India on a periodic basis.

The following information shall be readily available at all times:

- (a) the name of the service provider;
- (b) the internet protocol address of service provider;
- (c) the location of the service provider;
- (d) where the books of account, other books and papers are maintained on cloud, such address as provided by the service provider.

## **2. CLASSIFICATION:**

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

- a) Where there is a period for which a Document is required to be preserved as per applicable Law, for the period required by Applicable Law;
- b) Where there is no such requirement, for such period as the Competent/Authorised Person of the Company required to handle or deal with the Documents, takes a considered view about its relevance;

Provided that generally speaking, a Document may be preserved for a period of 5 years from the date on which the Document was originated.

An indicative list of the Documents and the time-frame for their preservation is provided hereunder:

### **3. MODES AND PLACE OF PRESERVATION & MAINTENANCE:**

The Documents may be preserved in

- i) physical form; or
- ii) Electronic Form

The Officer of the Company, generally the Head of the Department or Unit head shall be authorized Person who is expected to observe the compliance of requirements of applicable laws.

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 Authorised Person so as to ensure accuracy of the Documents and prohibition of unauthorized access.

### **4. CUSTODY OF 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, other storage devices or such other Documents and devices in his possession under the Policy.

### **5. CONVERSION OF FORM OF DOCUMENTS:**

The Physical Documents preserved may be converted, whenever required or felt necessary, into electronic form (digitalization) to ensure ease in maintenance of records and efficient utilization of space.

This will be done after obtaining prior approval of the Authorised Person.

**6. DOCUMENTS, REGISTERS AND RECORDS:**

PERMANENT PRESERVATION	PRESERVATION FOR A SPECIFIC PERIOD
<p>Companies Act 2013:</p> <p>The Memorandum and Articles of the Company</p> <p>Affidavit from the subscribers to the Memorandum and from persons named as The First Directors</p> <p>Register of Members and Index</p> <p>Books and Documents relating to the issue Of share certificates, including the blank Forms of share certificates</p> <p>Minutes book of General Meetings</p>	<p>Register of Charges – (8 years)</p> <p>Copies of all annual returns prepared under Sec. 92 of the Companies Act 2013 and copies of all certificates and Documents required to be Annexed thereto -(8 years from the date of filing with the Registrar of Companies)</p> <p>All Notices pertaining to disclosure of Interest of directors</p> <p>All certificates surrendered to the Company -(3 years from the date of surrender)</p> <p>Register of Deposits – (not less than 8 years from the date of last entry)</p> <p>Instrument creating charge or modification – ( 8 years from the date of satisfaction of charge)</p> <p>Annual Returns</p> <p>Books of account &amp; Financial Statement.</p>
<p>Secretarial Standard:</p> <p>Minutes of or Board meetings (SS-1)</p>	<p>Office copies of Notices, scrutinizer's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2)</p>

The maintenance of Documents and books & papers, Place of Keeping and their inspection shall be governed by the provisions of the applicable laws, like Companies Act 2013.

In case of Register of Members, Annual Returns etc., the applicable Section is 94

In case of Books of account the applicable Section is 128.

## 7. ARCHIVAL POLICY:

Archival material of the Company shall not be destroyed or purged without the approval of the Authorised Person.

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

The authorized person will be responsible for deciding how long archival material is to be retained in and under the direct control of the officer concerned, if the law does not specify any time period. The period shall not be less than 3 years.

With reference to the pretext, the Documents submitted to the Stock Exchanges, 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 exchanges, in terms of the Regulations, shall be done after the lapse of the preservation period of 5 years [as specified in Regulation 30(8)] as per the archival policy.
- b. For the Documents to be submitted to the stock exchanges to comply with the disclosure norms as required by any other Applicable law, the Documents are to be archived after the lapse of the specified/required time period.

For Nava Bharat Ventures Limited



D.Ashok  
Chairman