



POLICY ON PRESERVATION OF DOCUMENTS

1. LEGAL FRAMEWORK :

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents.

The Board of Directors (the "Board") of B.L. Kashyap and Sons Limited (BLK) has adopted this Policy at its meeting held on 14th November 2015, for Preservation of Documents, as required under applicable regulations.

The Policy shall be applicable on preservation of documents / records maintained by the Company either in Physical Mode or Electronic Mode

This Policy is effective from December 01, 2015.

2. DEFINITIONS

A. "Act" means the Companies Act, 2013 and rules made there under, as amended from time to time

B. "Board of Directors" or "Board" Board of Directors or Board shall mean the Board of Directors of B.L. Kashyap and Sons Limited, as constituted from time to time.

C. "Company" means B.L. Kashyap and Sons Limited

D. "Documents" Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

E. "Electronic Form" with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

F. "Listing Regulations" Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

G. "Policy" means policy on Preservation of documents.

3. OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

A. The documents of a permanent nature (**listed in Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

Provided further that the Company may keep the documents as specified above in an electronic mode.

B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (**listed in Annexure-2**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

5. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

6. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

7. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company.

8. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

9. GENERAL AUTHORISATION

The Policy shall be reviewed on a periodic basis and the Chairman, Managing Director / Whole-time Directors and Company Secretary are authorized jointly (by any two) to make such changes as may be deemed necessary or as warranted by law.

Documents whose preservation shall be permanent in nature

Annexure –I

S.No.	Nature of Document (s)
01	Certificate of incorporation
02.	Certificate of change of name (if any)
03	Memorandum and Articles of Association as amended from time to time
04	Statutory Registers required under applicable laws
05	Minutes of General Meeting
06	Minutes of Board Meeting
07	Minutes of various Committee Meetings
08	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time

Annexure –2

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

S.No.	Nature of Document (s)
01	Books of Accounts
02	Annual Return(s)
03	Attendance Register
04	Insurance Policies/ Claims under various policies
05	Non-Statutory Registers/Documents
06	Films, Videos, CDs, DVDs, tapes etc.
07	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.