

Policy for Preservation of Documents

Under Regulation 9 of the SEBI (Listing Obligations and Disclosures Requirements) Regulation, 2015

1. INTRODUCTION

The Securities and Exchange Board of India (SEBI) has issued the Securities and Exchange Board of India ((Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR”) which have come into force from 1st December 2015.

Regulation 9 of the aforesaid Regulations requires the Board of Directors of the Company to frame a Policy for Preservation of Documents (“Policy”) classifying them into two categories:

- i. Documents whose preservation shall be permanent in nature; and
- ii. Documents to be preserved for not less than eight years.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognises that all the documents, whether in physical or electronic mode, form an important and integral part of the Company’s records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

Accordingly, the Board of Directors of Akar Tools Limited (the Company) has adopted the Policy for Preservation of Documents.

2. APPLICABILITY AND MODES OF PRESERVATION:

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

3. OBJECTIVES OF THE POLICY

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

4. DEFINITIONS

In this policy unless the context otherwise requires -

- **"Act"** means the Companies Act, 2013 and rules made there under, as amended from time to time.
- **"SEBI Regulations"** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.
- **"Company"** means Akar Tools Limited.
- **"Documents"** refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form.
- **"Board or Board of Directors"** shall mean the Board of Directors of Akar Tools Limited, as may be re-constituted from time to time
- **"Electronic Form"** means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, space on electronic cloud or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- **"Maintenance"** means keeping documents, either physically or in Electronic Form.
- **"Preservation"** means to keep in good order and to prevent from being altered, damaged or destroyed.

5. RESPONSIBILITY

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

6. AUTHENTICITY

Where a document is being maintained both in physical form and Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

7. PRESERVATION PERIOD

The preservation period of the documents shall be such as mentioned in Annexure A of this policy. The preservation period starts with the conclusion of financial year, in which the document has been formed or the last entry was made and the preservation period of agreements starts with the end of the financial year, in which the agreement period expires.

8. PRESERVATION LOCATION

The preservation location will be the concerned Department. If the location is other than the concerned Department, the same shall be documented and kept in a file for reference purpose in the respective Departments. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.

9. DESTRUCTION OF DOCUMENTS

The documents specified in Annexure A which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and under the instructions as may be approved by the Functional/ Departmental Heads. Any deviation will be approved by the Chief Financial Officer.

10. 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.

11. REVIEW OF POLICY

This Policy shall be subject to review, if necessary. Any change/amendments in Applicable Laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy without any review. Any change/amendments to this Policy shall be approved by the Managing Director and Chief Financial Officer or Board of Directors.

ANNEXURE A

Records as per Companies Act, 2013

Sr. No.	Record Type	Preservation Period
1	Memorandum and Articles of Association	Permanent
2	Certificate of Incorporation	Permanent
3	Minutes of Board and Committee Meetings	Permanent
4	Minutes of Shareholders' Meetings	Permanent
5	Register of Index of Members	Permanent
6	Listing Agreement executed with the Stock Exchanges	Permanent
7	Register of investments in securities not held in the name of the Company	Permanent
8	Register of renewed and duplicate certificates	Permanent
9	Register of contracts in which Directors are interested	Permanent
10	Register of Directors, Managing Director, Manager and Secretary	Permanent
11	Register of Directors' Shareholding	Permanent
12	Register of Inter-corporate loans and investments	Permanent
13	Register of transfer of shares	Permanent
14	Register of Transmission of shares	Permanent
15	Forms filed with Registrar of Companies (ROC)	Permanent
16	Resolutions passed by circulation	8 Financial Years
17	Attendance Register - Board and Committee Meetings	8 Financial Years
18	Notice and Agenda of the Board and Committee Meetings	8 Financial Years
19	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years
20	Annual Returns	8 Financial Years
21	Correspondence with shareholders	8 Financial Years
22	Disclosures under SEBI - Substantial acquisition of shares and Takeovers, Regulations	8 Financial Years
23	Disclosures under SEBI - Prohibition of Insider Trading Regulations	8 Financial Years
24	Postal Ballot forms	8 Financial Years
25	Scrutinizer's Reports on voting at General Meetings/ Postal Ballot	8 Financial Years
26	Newspaper cuttings of notices of Board Meeting and Financial Results	8 Financial Years
27	Investor meet presentations	8 Financial Years

Accounts and Financial Records

Sr. No.	Record Type	Preservation Period
1	Annual Audited and Financial Statements	Permanent
2	Books of Accounts, Ledgers and Vouchers	8 Financial Years
3	Investment Records	8 Financial Years
4	Engagement Letters from Auditors	8 Financial Years

Tax Records

Sr. No.	Record Type	Preservation Period
1	Excise Returns, Income Tax Returns, Sales Tax Returns, VAT Returns, Service Tax Returns, GST Returns and other tax returns	8 Financial Years
2	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax, VAT, Service tax , GST and other tax laws	8 Financial Years