

**DHANLAXMI COTEX LIMITED**

CIN: L51100MH1987PLC042280

**POLICY ON PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY**

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

**INTRODUCTION:**

In terms of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations') the Company is required to formulate a policy on Preservation of Documents which is required to be maintained under the Listing Regulation.

In terms of Regulation 30(8) SEBI (Listing (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations') the Company is required to formulate an Archival policy for disclosure of all material events/ information of the Company specified in Schedule III of the Listing Regulation

**PURPOSE OF POLICY**

The corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per this Policy.

This policy categorizes the records that will be preserved indefinitely without any time limit and the records that will be preserved for specified period of time and outlines responsibilities to create, maintain and lawfully dispose of the records. It endorses the preservation of records in the Company's Archives.

**OBJECTIVE OF THE POLICY**

The objective of the policy is to preserve the documents of the Company for the period mentioned under Regulation 9 of SEBI (Listing (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations') and to archive any of the material events/ information which are disclosed to the Stock Exchange and placed on the website of the Company prior to a period of 5 years in terms of Regulation 30(8) SEBI (Listing (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations'))

This Policy mechanism provides the comprehensive framework for preservation of documents for a specified period of time to achieve the following objectives:

- a) Effective corporate governance and risk management;
- b) Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- c) Systematic disposal/destruction of Company's non-current records that have outlived their administrative usefulness.
- d) Identification of the Company's records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company's Archives

**SCOPE OF THE POLICY**

For the purpose of achieving the above objectives, the documents covered as per this Policy have been divided into two sections, i.e. the records or the documents that will be preserved permanently by the Company and the records or the documents that will be preserved for the period of at least 8 years and not permanently. This Policy applies to the records maintained by the Company in any format or medium. The records which are not required to be retained permanently shall be disposed off according to this Policy.





## **AUTHORITY & RESPONSIBILITY**

Pursuant to the Listing Regulations, this Policy has been established and approved by the Board of Directors.

Mr. Ramautar Jhawar, Managing Director of the company or Mr. R.K. Pander, officer of the Company or any person authorised by the Board, shall be responsible to deal with the records according to the time frame prescribed in the Policy for their preservation.

All staff and management of the Company shall assist in implementing this Preservation Policy as appropriate to their respective roles and responsibilities.

## **CLASSIFICATION OF RECORDS**

Based on the requirement and for the purpose of effective management, the period for which the records of the Company shall be maintained have been classified into **two categories**:

- I. Documents whose preservation shall be permanent in nature;
- II. Documents whose preservation shall be at least for 8 years.

The classification of the documents has been made in the Annexure which forms part of this Policy.

While prescribing different time periods for preservation of records, the following aspects have been taken into account:

- (a) Compliance with statutory and regulatory requirements.
- (b) Requirements of SEBI/RBI/MCA officials to have access to certain records.
- (c) Requirements of internal and external auditors to have access to certain records.

The documents or records not covered by this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulation, for the time being in force.

## **LOCATION OF RECORDS**

As mandated by the Companies Act, 2013 or under any other statute, certain records shall be located at the registered office of the Company. The records for which no specific place has been specified under any statute may be maintained at any other place as may be, decided by the officers of the Company considering their utilization and usefulness.

## **ARCHIVAL POLICY:**

In line with Company's policy on Determination of materiality of events and as per the Listing Regulation, the Company shall disclose all such events to the Stock Exchange and such disclosure shall be hosted on the website of the Company for a minimum period of 5 years from the date of the disclosure and same shall be archived from the website of the Company for a further period of 3 years. After the expiry of the statutory retention period, the preserved document may be destroyed.

## **RECORD RETENTION SCHEDULE**

The records referred to in **Annexure I** of this Policy shall be maintained permanently and the records which are required to be preserved permanently on the website of the Company shall be preserved in line with the Archival Policy of the Company.

Records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use. The records referred to in **Annexure II** shall be preserved for at least 8 years or may be disposed of after the expiry of the periods of their preservation, after the approval of the Company Secretary or such other Authorised person of the Company.

