

# **PUNIT COMMERCIALS LIMITED**

Diamond Manufacturers, Importers & Exporters

## **DOCUMENT RETENTION AND ARCHIVAL** **POLICY**

Date of Issue: **07th November, 2015**

## DOCUMENT RETENTION AND ARCHIVAL POLICY

As per Regulation 9 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulation 2015, the listed entities are required to formulate and put in place a policy for preservation and archiving of documents.

Accordingly the Board of Directors of the Company has adopted this Policy on 07<sup>th</sup> November, 2015 which shall come into force from December 01, 2015

### **Objective:**

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

#### A. The documents to be maintained and preserve permanently:

The Documents listed in **Annexure A** 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.

The modifications, amendments, additions, deletions if any in the documents shall also be preserved permanently by the Company.

#### B. The documents to be maintained and preserved for a specified time period:

The documents listed in **Annexure-B** 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.

The modifications, amendments, additions or deletions if any 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.

### **Record maintenance and storage:**

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 and ensure that it is in compliance with various Acts/Rules/Regulations applicable to their respective Departments.

The electronic version (s) of the records are to be maintained within the centralized electronic record software database maintained by the IT Department.

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Any change desired in the above schedule, the respective Department should communicate to the Company Secretary/Board.

## **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.

## **Destruction of Documents:**

After the expiry of the statutory retention period, the preserved documents which are no longer required may be destroyed in such mode after obtaining prior approval from the Director/ Board. In case any specific procedure is prescribed under applicable Act/Rules/Regulations for destruction of documents, the same shall be followed by the Company

This applies to both Physical and Electronic Documents.

## **Communication and Dissemination of the Policy:**

The copy of this policy shall be posted on website of the Company.

## **Amendments:**

The Board may amend this policy from time to time as they may deem fit and/or to incorporate any subsequent amendments or modifications in the Listing Regulations in respect to matters covered under this policy or otherwise.

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## Annexure A

Documents whose preservation shall be permanent in nature

1	Agreements / Contracts
2	Audited financial statements
3	Investment Documents / proofs including certificates etc.
4	Licenses & Statutory Approvals
5	Minutes of Board Meeting / General Meeting / various Committee Meetings
6	Orders issued by Courts / Statutory bodies
7	Registration Certificates
8	Statutory Registers required under applicable laws / Common Seal / Certificate of Incorporation / Certificate of change in Name / Forms filed with MCA etc
9	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

## Annexure B

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

1	Annual Return(s)
2	Books of Accounts
3	Correspondences with Departments / shareholders
4	CDs, DVDs, etc.
5	Insurance Policies / Claims under various policies
6	Income Tax / Service Tax / TDS Records
6	Non-Statutory Registers / Documents
7	Personnel Documents
8	Press release
9	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.