

Chandni Machines Limited

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CIN: L74999MH2016PLC279940

POLICY ON MAINTENANCE & PRESERVATION OF DOCUMENTS **OF** **CHANDNI MACHINES LIMITED**

PREFACE

The Board of Directors (the "Board") of Chandni Machines Limited (the "Company") has adopted the following policy with regard to preservation of Documents. This Policy has been formulated in accordance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. This Policy shall be known as "Policy for Maintenance and Preservation of Documents" and shall be effective from 1st December, 2015.

OBJECTIVE

The purpose of this Policy is to specify the type of document(s) and time period for preservation thereof based on the classification mentioned under the Regulation 9 of the Listing Regulations, 2015.

DEFINITION

"**Board of Directors**" or "**Board**" shall mean the Board of Directors of Chandni Machines Limited as constituted from time to time.

"**Company**" shall mean Chandni Machines Limited

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

"**Act**" shall mean the Companies Act, 2013

"**Listing Regulations**" shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The Company shall maintain and preserve documents as specified hereunder:

Category (A): The documents of permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion, or any changes made therein from time to time

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

Category (B): The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in Annexure 2) shall be preserved by the company for a term not less than eight years after completion of the relevant transactions

subject to the modifications, amendments, addition, deletion 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.

For the purpose of this policy, documents may include the following:

- i. 'books and papers' as defined in clause 12 of section 2 of the Act;
- ii. 'books and papers' as defined in clause 13 of section 2 of the Act;
- iii. 'documents' as defined in clause 36 of section 2 of the Act;
- iv. 'registers' as defined in clause 74 of section 2 of the Act

Further, the company may be deeming fit and possible from time to time, maintain above mentioned documents in electronic form to the extent possible.

MODES OF PRESERVATION OF THE DOCUMENTS

- i. The documents may be preserved in physical form or electronic form
- ii. The officer of the Company required to preserve the documents shall be Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law.
- iii. 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
- iv. The preserved documents must be accessible at all reasonable times. Access may be controlled by Authorised person, so as to ensure integrity of the Documents and prohibit unauthorized access.

DISPOSAL/DESTRUCTION OF DOCUMENTS

The temporary documents as listed in Category (B), excluding the current Documents shall be destroyed after the relevant or the prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under Applicable Laws pursuant to which the Documents have been preserved. A register of the Documents disposed/destruction shall be maintained as per Annexure 3

ROLES AND RESPONSIBILITY

The respective Departmental Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy which shall be reported annually to the Audit Committee for its review.

AMENDMENT

Any change in the policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and/or amend any part of this policy or the entire policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

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ARCHIVING OF DOCUMENTS WHICH ARE HOSTED ON COMPANY'S WEBSITE

Recognizing the need to ensure the preservation and availability of the Documents of the Company after their required regulatory preservation period, for any legal, administrative and historical purposes, the Company adopts the following archival policy in respect of Documents which are hosted on the website of the Company:

- i. All Documents, generated, disclosed by the Company, on its website for the purpose of shareholder communication, is the property of the Company and constitute archival material.
- ii. Archival material of the Company shall not be destroyed without the prior approval of the Authorised Person.
Provided that nothing contained herein shall be deemed to lead to an exception in case of an accidental deletion, or deletion due to any system failure, virus, or any other deletion, inaccessibility or loss due to reason other than deliberate and determinate deletion.
- iii. Material so selected for preservation shall be archived on the Company Website.
- iv. The Authorised Person, in consultation with the Board will decide the period for which the archival material is to be retained, if the law does not specify any time period. However the period shall not be less than 3 years.
- v. The Documents required to be submitted to the stock exchange, and those which are required 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 exchange, and hosted on the website in terms of the Regulations, shall be done after the lapse of the preservation of 5 years [as specified in Regulation 30(8)]
 - b. For the Documents to be submitted to the stock exchange and hosted on the website to comply with disclosure norms as required by any other Applicable Law, the Documents are to be archived after the lapse of the required time period.

Annexure 1

DOCUMENTS FOR PERMANENT PRESERVATION

- Registration Certificate
- Memorandum & Articles of Association
- Licenses & Statutory Approvals
- Statutory Registers required under applicable laws
- Audited Financial Statements
- Minutes of General Meetings
- Minutes of Board Meetings
- Minutes of various Committee Meetings
- Material Agreements/Contracts
- Orders issued by Courts/ Statutory Bodies
- Any other documents as may be required to be maintained permanently in terms of applicable law(s), and as maintained and preserved from time to time.

Annexure 2

DOCUMENTS FOR PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS

- Books of Accounts
- Annual Returns
- Personnel Documents
- Insurance Policies/Claims under various policies
- Correspondence with Departments/Shareholders
- Non-Statutory Registers/ Documents
- All notices pertaining to disclosure of interest of Directors
- Any other document as may be required to be maintained in terms of applicable law(s), maintained, and preserved from time to time.

Annexure 3

FORMAT OF THE REGISTER OF DOCUMENTS DISPOSED/DESTROYED-

Particulars of Documents along with provision of applicable law	Date and Mode of Destruction	Initials of the Authorised Person