

KERALA AYURVEDA LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

PREAMBLE

Pursuant to Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) The Board of Directors of Kerala Ayurveda Limited (“the Company”) is required to formulate a policy for “Preservation of Documents”.

The Board of Directors (“Board”) of Kerala Ayurveda Limited (“Company”) has approved the Policy for Preservation of Documents (“Policy”) for the Company.

The Policy shall be applicable on preservation of documents / records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “Documents”).

EFFECTIVE DATE

This Policy is effective from December 1, 2015.

PURPOSE OF THE POLICY

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same.

SCOPE

This policy is applicable to all departments of the Company. It ensures that the Company maintains electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

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.

DEFINITIONS

- a) Act: "Act" means the Companies Act, 2013 including any amendment or modification thereof.
- b) Board: Board means Board of Directors of the Company
- c) Company: "Company" means Kerala Ayurveda Limited.
- d) Director: "Director" means a person as defined in Section 2(34) of the Companies Act, 2013 and presently appointed as a Director in the Company.
- e) Document: "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- f) Employees: "Employees" shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.
- g) Key Managerial Personnel: "Key Managerial Personnel" shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.
- h) Regulations: "Regulations" shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015
- i) Secretarial Standards: "Secretarial Standards" means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.
- j) Stock Exchange or Exchanges: "Stock Exchange or Exchanges" shall mean BSE Limited.
- k) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

GOVERNING LAWS

This policy shall be governed by the Companies Act 2013, SEBI Act, Rules and Regulations, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

GUIDELINES

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows –

- a. Documents whose preservation shall be permanent in nature;
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. Documents that need to be preserved and retained permanently;
- b. Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;
- c. Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- d. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”.

An indicative list of the documents and the time-frame of their preservation is provided in **Annexure–A**.

MODES OF PRESERVATION:

The Documents may be preserved in

- a. Physical form; or
- b. Electronic Form

The official of the Company who is required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

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.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and to prohibit unauthorized access.

DESTRUCTION OF DOCUMENTS

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure A** may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer

required as per the documents Preservation Schedule given under **Annexure A**. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at **Annexure B**. The entries in the register shall be authenticated by the Authorised Person.

AMENDMENTS TO THE POLICY

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

ANNEXURE – A

Indicative List

A. PERMANENT PRESERVATION:

- a) Common Seal,
- b) Minutes books of Board, General Meetings and Committee Meetings,
- c) Statutory Registers,
- d) License and Permissions,
- e) Statutory Forms and disclosures except for routine compliance,
- f) Scrutinizers' Report,
- g) Register of Members and
- h) Index of Members.

B. TEMPORARY PRESERVATION UPTO 8 YEARS:

- a) Annual Returns,
- b) Board Agenda and supporting documents,
- c) Attendance Register,
- d) Office copies of Notice of General Meeting and related papers,
- e) Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers,
- f) All notices pertaining to disclosure of interest of directors,
- g) Instrument creating a charge or modification,
- h) Books of accounts, financial statements etc. and
- i) Register of debenture holders or any other security holders.

C. OTHERS:

As per applicable law.

ANNEXURE - B

Specimen format of the register of documents disposed-off / destroyed

PARTICULARS OF DOCUMENT ALONG WITH PROVISION OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON