



P R A K A S H

Constrowell Limited

POLICY ON PRESERVATION OF DOCUMENTS

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OBJECTIVE:

The Board of Directors of Prakash Constrowell Limited at its meeting held on February 12, 2016, has adopted the following Policy on preservation of Documents/ Records maintained by the Company either in Physical mode or Electronic Mode. This Policy is framed as per requirements of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and for systematic identification, categorization, maintenance, review, retention and disposal/ destruction of documents and records received or created in the course of business. This Policy would ensure safe-keeping of the records and would safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents.

This Policy will be effective from 12th February, 2016.

DEFINITIONS:-

1. Board” means the Board of Directors of the Company;
2. “Company” means Prakash Constrowell Limited;
3. Documents- refers to papers, files, memos, plans, media, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence , minutes, indices, registers and or any 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 and does not include multiple or identical copies.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law or shall be understood in their general meaning.

ADMINISTRATION AND OBLIGATION OF THE HEAD OF DEPARTMENT OF THE COMPANY:

The Company Secretary and the Compliance Officer of the Company, (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure Preservation of documents and records.

The heads of respective departments are obligated to ensure the preservation of documents pertaining to their area of responsibilities in accordance with the applicable laws/ regulation in consultation with the Administrator. The Head of the Department shall include:

- a. Officers of the Company heading a department irrespective of designation
- b. Director reporting to the Board

PRESERVATION OF DOCUMENTS AND RECORDS:

The Documents and Records for Preservation can be classified in 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 transaction.

Provided that the Company may keep documents specified in clauses (a) and (b) in electronic mode.

PROCESS:

A) Permanent Preservation:

- 1) All documents filed with Ministry of Corporate Affairs.
- 2) All documents filed with SEBI / BSE / NSE.
- 3) All documents filed with Tax Authorities in Income Tax, Service Tax, VAT & similar tax authorities.
- 4) All permits, licenses, authorization from any statutory authorities.
- 5) Audited Accounts
- 6) Documents relating to investment in subsidiaries.
- 7) Any other document required to be preserved permanently under any law / statute.

B) Preservation for 8 years:

- 1) Bank, cash vouchers, payment vouchers, warrants
 - 2) Bank statements
 - 3) Purchase bills
 - 4) Sales invoices, Debit / credit notes, etc.
 - 5) Accounting records
 - 6) Any documents related to correspondence with Customs at CFS
 - 7) Any other documents required to be preserved for 8 years under any law / statute.
- C) Other Documents may be stored and preserved in physical form/ electronic form, after the completion of the relevant transactions, for such period as may be required, in each case.

Electronic Mail:

- All e-mails received from Internal and External Sources may be deleted after 3 Years.
- Employees will strive to keep their e-mail related to business issues
- All Email related to business issue should be downloaded to a server user directory on server.
- Employees will take care not to send confidential information to outsiders.

Web pages files

- 1) All such events / information hosted on the Company's website shall be retained for a period of 5 years as specified in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- 2) After the initial period of 5 years, documents / information (except documents of permanent nature) shall be archived for a further period of 3 years.
- 3) Documents of permanent nature, uploaded on the Company's website, shall be archived.

In any circumstance where the terms of this policy differ from any existing enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standards will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.

AMENDMENTS:

The Board reserves the right to amend or modify this Policy in whole or in part, at any point of time.