



▲ KABIR DAS INVESTMENT LTD ▲

POLICY ON PRESERVATION OF DOCUMENTS

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Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

POLICY ON PRESERVATION OF DOCUMENTS

1. PREFACE AND OBJECTIVE:

As per Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories i.e.,

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

The listed entity may keep such documents in electronic mode.

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), the Board of Directors (the "Board") of Kabirdas Investments Limited (KIL) has adopted this Policy at its meeting held on 15th May, 2024, for Preservation of Documents, as required under applicable regulations.

This Policy is effective from 15th May, 2024.

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

The objective is to determine preservation period for records/documents based on their reference value and legal requirements. The following aspects are considered while arriving at the preservation period:

- Company's own information retrieval needs (reference value).
- Statutory requirements under respective statutes.
- Litigation requirements.
- To ensure easy retrieval.
- To ensure that unwanted records do not occupy storage space.

2. DEFINITION

In this policy unless the context otherwise requires:

- a. "**Act**" means the Companies Act, 2013 and rules made there under, as amended from time to time.
- b. "**SEBI Regulations**" shall mean Securities and Exchange Board of India (Listing Obligations and

Disclosure Requirements) Regulations, 2015, as may be amended from time to time.

- c. "**Company**" means Kabirdas Investments Limited (KIL).
- d. "**Document**" includes summons, notice, requisition, order, declaration, agreement, note, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- e. "**Key Managerial Personnel**" or "**KMP**" shall have the same meaning ascribed to it under the Act.
- f. "**Board**" or "**Board of Directors**" shall mean the Board of Directors of Kabirdas Investments Limited, as may be re-constituted from time to time.
- g. "**Financial Year**" shall have the same meaning ascribed to it under the Act.
- h. "**Electronic Form**" with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.

3. SCOPE

These guidelines will be valid for determining preservation period for commercial and legal records; and will be applicable to all locations of the Company.

4. RESPONSIBILITY

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

5. PRESERVATION PERIOD

For determining the preservation period, the records are categorized into following three categories:

(I) CATEGORY I

(Documents whose preservation shall be permanent in nature)

The following documents shall be maintained and preserved permanently by the Company. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

- a) Annual Reports of the Company.
- b) Minutes of the Board Meetings and Board Committees as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- c) Minutes of General Meetings (including AGMs) as prescribed by the "Secretarial Standard-2 on General Meetings" issued by the Institute of Company Secretaries of India.
- d) Any other document, certificates, statutory registers that may be required to preserved permanently in terms the Companies Act, 2013 and/or SEBI Regulations.

(II) CATEGORY II

(Documents to be preserved for not less than eight years after completion of the relevant transaction).

The following documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight years.

- a) Documents/Information furnished to Stock Exchanges including information submitted in compliance SEBI Regulations, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished.
- b) Documents/Information submitted to Registrar of Companies/Ministry of Corporate Affairs in compliance with the Companies Act, 2013 & Rules thereunder shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is submitted.
- c) Books of Accounts.
- d) Annual Returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act, 2013.
- e) Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- f) Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM) shall be preserved for as long as they remain current or for eight financial years,

whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-2 on General Meetings" issue by the Institute of Company Secretaries of India.

- g) Attendance Register for Board Meeting and recording of attendance of Meetings thro Electronic Mode if any, for eight financial years and may be destroyed thereafter with approval of the Board of Directors, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- h) Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act, 2013 and/or SEBI Regulations.

(III) **CATEGORY III - General**

In addition to the documents mentioned in Category 'I' and 'II' above, other documents, certificates, forms, statutory registers, records, etc. which are required to be mandatorily maintained and preserved shall be preserved for a stipulated period of time as per the existing Rules/Procedures/ Practices of the Company or as per the applicable Statutory/Regulatory provisions in this regard.

Records which are required for adducing evidence in judicial or quasi judicial or other dispute Redressal forum shall be kept till the time the matters are finally disposed of.

Notwithstanding the general guidelines, care should be taken by the respective departments to ensure that records of special nature such as unsatisfied claims by or against the company, suspending in courts, tribunals, quasi judicial for a and other mediation and alternate dispute for industrial disputes, etc. are preserved according to specific needs and even beyond the prescribed period.

Also, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc. from Government/Statutory Bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines/instructions, if any, by the issuing authority.

6. **PRESERVATION LOCATION**

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.

7. MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form.

8. DESTRUCTION OF RECORDS

The records/documents preserved shall be reviewed every year or according to need by the respective department and action taken to destroy those records which are due for disposal.

9. GENERAL AUTHORISATION

The Policy shall be reviewed on a periodic basis and the Chairman and Managing Director/Whole-time Directors and Company Secretary are authorised jointly (by any two) to make such changes as may be deemed necessary or as warranted by law.