

KREON FINANCIAL SERVICES LIMITED

Policy for Preservation of Documents

PREAMBLE:

The Securities and Exchange Board of India (SEBI) has issued and notified "SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, on 2nd September 2015.

The Regulations requires the Board of Directors of a company to frame a Policy for Preservation of Documents. This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Listing Regulations") and Companies Act, 2013.

Archival Policy as referred to in Regulation 30 (8) of the Listing Regulations also forms part of this Policy. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of Companies Act, 2013.

The Documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that documents whether in physical or electronic mode, forms an important and integral part of the Company's records. The preservation of Documents is important in order to ensure immediate access to the records, its retrieval and authentication.

PURPOSE AND APPLICABILITY OF THE POLICY

Regulation 9 of the Listing Regulations mandates that a 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-

- i. Documents whose preservation shall be permanent; and
- ii. Documents to be preserved for not less than eight years after completion of relevant transactions.

MODE OF MAINTENANCE

This Policy is applicable to all Documents specified above in (i) and (ii), maintained in physical and electronic mode by the Company.

The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to. All the records shall be maintained as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

The Documents not covered under this Policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

DOCUMENTS:

For the purpose of this Policy the term "*Documents*" shall mean statutory records, registers, returns, forms, minutes, notices, advertisements or any other records required to be maintained and preserved by the Company in physical or electronic form under the Companies Act, 1956 / Companies Act, 2013, Securities and Exchange of India Act, 1992, Securities Contracts (Regulation) Act, 1956 and the Depositories Act, 1996 or any other applicable laws and does not include multiple or identical copies.

POLICY:

1. PRESERVATION OF DOCUMENTS

A. Preservation of Documents with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

i. Documents whose preservation shall be permanent in nature :

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently. Details of documents whose preservation shall be permanent in nature is listed in **Annexure-A**.

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

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a period of not less than eight years after completion of the relevant transactions shall be preserved accordingly. Detail of documents with preservation period of not less than eight years after completion of the relevant transactions is listed in **Annexure-B**.

iii. Documents with preservation period other than those mentioned in (i) and (ii) above :

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in (i) & (ii) above shall be preserved accordingly.

B. Documents to be made available on the website of the Company as required by the Companies Act, 2013 and the Listing Regulations

- i. The Company is to maintain a functional website containing
 - the basic information about the Company,
 - all Information and/or documents as specified in the applicable provisions of Companies Act, 2013,
 - all Information and/or documents as specified in Regulation 46 (2) of the Listing Regulations,
 - all Information and/or documents as mentioned in Regulation 30 of the Listing Regulations on Material Events,
 - all other Information and/or documents as required under Listing Regulations,
- ii. The Company shall ensure that contents of the website are correct.
- iii. The Company shall update any change in the content of its website within two working days from the date of such change in content.
- iv. Information and/ or Documents that need to be made available under Regulation 30 of the Listing Regulations shall be made available on the website simultaneously with disclosure to Stock Exchanges.
- v. The information and/or documents uploaded on the website shall be available for current financial year and for the preceding five financial years.

2. ARCHIVAL OF DOCUMENTS MENTIONED IN CLAUSE (A) & (B) OF CLAUSE 1

Documents mentioned in sub clause (A) & (B) of Clause 1 above shall be maintained/ preserved in the following manner:

a. Documents maintained in physical form:

- i. All information and/or documents pertaining to current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.

- ii. All documents pertaining to the period prior to one preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation in Annexures attached hereto. The said records be also maintained in such a manner that their retrieval is easy and quick.

b. Documents maintained in electronic form:

- i. All documents pertaining to current Financial year and for one preceding financial year shall be maintained on server and Backup be maintained on scheduled time and day. The documents shall be maintained in such a manner that their retrieval is easy and quick.
- ii. Back up of all documents pertaining to the period prior to one preceding financial year shall also be maintained on server, in good condition at least up to the minimum period specified for their maintenance / preservation. The said records be also maintained in such a manner that their retrieval is easy and quick.

c. Documents made available on the website of the company:

After the expiry of time mentioned in Clause 1 (B) (v) of this policy (i.e. five financial years preceding the current financial year), the information and/or document shall be removed from the main website.

3. DESTRUCTION OF DOCUMENTS MENTIONED IN SUB CLAUSE (A) & (B) OF CLAUSE 1 OF THIS POLICY

Any of the documents mentioned in sub clause (A) & (B) of clause 1 of this policy, which are not required to be maintained and preserved permanently shall be destroyed.

If documents / records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use. The documents / records referred to in Annexure B shall be preserved for at least 8 years (or additional period decided by the Company) may be disposed of after the expiry of the periods of their preservation, after the approval of the Board and the Company Secretary of the Company.

The Company shall maintain a register of disposal of records, either in physical or electronic form, under the custody of the Compliance Officer of the Company, wherein the brief particulars of the records disposed of shall be entered as follows.

- a) Item Number;
- b) Brief Particulars of the records disposed of;
- c) Date of approval for disposal of records;

- d) Date of disposal; and
- e) Mode of destruction

4. AMENDMENTS AND UPDATES

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not 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

Documents / Record whose preservation shall be permanent in nature

Sl. No.	Documents / Records
1	Certificate of incorporation
2	Memorandum and Articles of Association
3	Agreements made by the Company with Stock Exchanges, Depositories, etc.
4	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
5	Register and Index of Members, debenture-holders, if any or other security holders, if any
6	Register of Contracts as per Companies Act, 2013
7	Register of Charges as per Companies Act, 2013
9	Register of directors and KMP
10	Register of loans, guarantee, security and acquisition made by the company
11	Register of Investments not held in its own name by the Company, if any
12	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
13	Authorization / licenses obtained from any statutory authority
14	Policies of the Company framed under various regulations
15	Register of disposal of records
16	Intellectual Property Rights Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs, that are owned by the Company
17	Such other records as may be required under any law from time to time

ANNEXURE - B

Documents / Record to be preserved for a minimum period of eight years

Sl. No.	Documents / Records
1	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2	Annual Returns as per Companies Act, 2013
3	Register of Deposits as per Companies Act, 2013
4	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
5	Annual financial statements including: - Annual accounts - Directors report - Auditors report
6	Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013
7	Income Tax Returns filed under Income Tax Act, 1961
8	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
9	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
10	Copy of newspaper advertisement or publications
11	Compliance Reports received from any statutory authority
12	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
13	Disclosure/Return filed under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015
14	Legal documents including but not limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters