



CHOICE INTERNATIONAL LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS



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1. PREAMBLE:

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 various provisions of the Companies Act, 2013.

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:

- (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.

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

Further, Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information, which have been disclosed to stock exchange(s) under Regulation 30, shall be hosted on the website of the Company for a minimum period of five years, and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per the applicable provisions of the Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

Accordingly this policy has been framed, keeping in view particularly the requirements of the Listing Regulations and the provisions of the Companies Act, 2013.

2. SCOPE:

This Policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. OBJECTIVE OF THE POLICY

The main objective of the Policy is to ensure that all the statutory document are preserved in compliance with the Regulations and as per policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after the following the due process of discarding the same.

The documents can be classified in two categories i.e.

- (i) documents which need to be preserved permanently and
- (ii) documents which need to be preserved for a specific period of time.

This Policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirement.

The Major objectives of the Policy are:

- i. Identification of Statutory Registers and other records of the Company which are required to be preserved.
- ii. Identification and Categorisation of the Statutory registers and other records to be maintained either for eight years or permanently.
- iii. To decide whether the statutory records and documents are to be preserved in physical form or in electronic form
- iv. After completion of 8 Years, for the Statutory documents which are to be preserved for 8 years only may be disposed off as per the guidelines of the policy or as decided by the Board of Directors at that time.
- v. Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.
- vi. Effective corporate governance and risk management;
- vii. Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- viii. Systematic disposal/destruction of Company's non-current records that have outlived their administrative usefulness.
- ix. Identification of the Company's records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company's Archives.

4. DEFINITIONS:

- a. "Company" means "Choice International Limited" ;
- b. "Board" means the Board of Directors of the Company;
- c. "Listing Regulation" means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulation 2015;
- d. "Policy" means this policy of Preservation of Documents of the Company;
- e. "Records" in relation to this policy includes accounting records , books and papers and book and paper as defined in sub section 12 of section 2, books of accounts as defined in sub section 13 of section 2 of the Companies Act , 2013 and statutory and other documents of material significance.

5. AUTHORITY & RESPONSIBILITY

Pursuant to Listing Regulations, this Policy has been established and approved by the Board of Directors at its meeting held on February 13, 2016

The Company Secretary and Chief Financial Officer of the Company shall be responsible to deal with the records according to the time frame prescribed in the Policy for their preservation.

6. CLASSIFICATION OF RECORDS:

Based on the requirement and for the purpose of effective management, the period for which records of the Company shall be maintained have been classified in to two categories.

- a) Documents whose preservation shall be permanent in nature
- b) Documents whose preservation shall be at least for 8 Years.

The Classification of Documents has been made in the Annexure which forms part of this policy. While prescribing different time periods for preservation of records, the following aspects have been taken in to account.

- i. with statutory and regulatory requirement.
- ii. Compliance Requirement of SEBI/ RBI/. MCA officials to have access to certain records.
- iii. Requirements of Internal and External auditors to have access to certain records.

The documents or records not covered by this policy shall be maintained by the company for time period specified for their preservation under any statute or regulation, for time being in force.

7. LOCATION OF RECORDS

As mandated by the Companies Act,2013 or under any other statute , certain records shall be located at the Registered Office of the Company. The records for which no specific place has been specified under any statute may be maintained at the corporate office of the Company or at any other place as may be , decided by the officers of the Company considering their utilization and usefulness.

8. RECORD RETENTION SCHEDULE

The records referred to in Annexure A of this policy shall be maintained permanently and the records which are required to be preserved permanently on the website of the Company shall be preserved in line with the Archival Policy of the Company.

Record 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 records referred to in Annexure B shall be preserved for at least 8 years or may be disposed of after the expiry of the periods of their preservation, after the approval of the Company Secretary and Chief Financial Officer of the Company.

The Company shall maintain a register of disposal of records in the custody of the Compliance Officer of the Company. Wherein the brief particulars of the records disposed off shall be entered. The register of disposal of records shall contain the following Columns:

- a) Item Number
- b) Brief Particulars of the records disposed of
- c) Date of approval for disposal of records
- d) Date of Disposal
- e) Mode of Destruction

The Register of disposal of records shall be maintained permanently by the Company with the assistance the Compliance Office either in Physical or electronic for

9. RECORD APPRAISAL

The Company shall at regular Intervals carry out the appraisal of the records as per policy. The Purpose of the appraisal process shall be to ensure that the records are examined at the appropriate time to determine. (i) whether or not they are worthy of archival preservation (ii) Whether they need to be retained for a longer period as they are still in use. Or (iii) Whether they should be destroyed. The appraisal of records shall be undertaken only after the approval of the Company Secretary and Chief Financial Officer of the Company.

10. COMPLIANCE OFFICER:

The Company Secretary of the Company shall be the Compliance Officer of the Company.

11. REVIEW OF POLICY

The Policy shall be subject to the review of the Board as may be deemed necessary and in accordance with any regulatory amendments.

RECORDS TO BE PRESERVED PERMANENTLY
Annexure – A

Sr.No	Records
1	Certificate of incorporation
2	Certificate for commencement of business
3	Memorandum and Articles of Association
4	Agreements made by the Company with Stock Exchanges, Depositories, etc.
5	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
6	Register and Index of Members, debenture-holders, if any or other security holders, if any
7	Register of Contracts as per Companies Act, 2013
8	Register of Charges as per Companies Act, 2013
9	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
10	Authorization / licenses obtained from any statutory authority
11	Policies of the Company framed under various regulations
12	Register of disposal of records
13	Certificates obtained from various statutory authorities
14	Such other records as may be required under any law from time to

RECORDS TO BE PRESERVED FOR 8 YEARS
Annexure – B

Sr. No.	Records
1	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2	Register of Inter Corporate Loans and Investments as per the Companies Act, 2013
3	Annual Returns as per Companies Act, 2013
4	Register of Deposits as per Companies Act, 2013
5	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
6	Annual financial statements including: - Annual accounts -Directors report -Auditors report
7	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
8	Income Tax Returns filed under Income Tax Act, 1961
9	All notices in form MBP – 1 received from Directors and KMPs alongwith any amendment thereto
10	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
11	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
12	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases.
13	Compliance Reports received from any statutory authority
14	Correspondences made with any statutory authority
15	Register of Power of attorneys, if any
16	Forms and returns filed with RBI/MCA or with any other statutory authority

By order of the Board of Directors of
Choice International Limited