

Kabra Extrusiontechnik Limited

Kolsite House, Off. Veera Desai Road, Andheri (West), Mumbai – 400 053
Tel. : 022-26734822-24 Fax. : 022-26735041 Email : sales@kolsitegroup.com
CIN : L28900MH1982PLC028535 URL : www.kolsite.com

POLICY ON PRESERVATION OF DOCUMENTS

1. Statutory Obligations

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to said Regulations) provides to have a policy for preservation of documents, approved by its board of directors.

2. Purpose

This Policy is framed to ensure that the statutory documents and records of the Company are adequately protected and preserved for a period prescribed under the various statutes.

This policy provide guidelines for disposal / discarding of the records of the Company which are no longer required or of no value.

3. Preservation of Documents

Provisions of Companies Act, Income Tax Act, Excise, Service Tax Act, Factory and Labour Laws and rules made thereunder etc. prescribe for maintenance and preservation of records. Similarly Accounting and Secretarial Standards prescribe in the matter.

Records are classified based on the period for which they are required to be preserved :

- (i) Permanent in nature
- (ii) Documents with preservation period of not less than eight years after completion of the relevant transactions.

Particulars thereof are presented in Annexure I

4. Disposal of Documents

The documents of the Company which are no longer required as per time schedule presented in Annexure I may be destroyed by the Company in the manner prescribed in Annexure II

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, then the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of.



5. **Approval and Amendment**

This policy is approved by the Board of Directors in compliance of above referred Listing Regulations. This policy be posted on the website of the Company. This policy shall be subject to change as may deem necessary in compliance of statutory requirements. The Board of director shall have right to amend the same as it deem fit and the decision of the Board in this respect shall be final and binding.

Annexure I

Documents to be preserved on permanent basis under Section 88 and 118 of Companies Act, 2013 and rules made thereunder :

- i) Register of Members
- ii) Index of Members
- iii) Minutes of Board Meetings
- iv) Minutes of Committee Meetings of the Board
- v) Minutes of General Meetings
- vi) Report on resolutions passed by Postal Ballot forming part of minutes

Documents to be maintained / preserved for a period of 8 years

Record Type	Remarks
1. Annual Return	Copies of all annual return prepared under Section 92 of the Companies Act and copies of all certificates and documents required to be annexed thereto for a period of 8 years from the date of filing with the Registrar of Companies
2. Books of Accounts as defined under Section 2(13) of the Companies Act	For a period not less than 8 financial years immediately preceding a financial year together with the vouchers relevant to any entry in such books of account shall be kept in good order
3. Office copies of notices of Board, Committee and General Meetings	
4. Board Agenda note and supporting papers	
5. Attendance Register	
6. Bank Statements, investment records etc.	
7. Statutory Registers, Forms, Reports	
8. Audited Signed Financial Statements with report thereto	

Statutory Registers, Forms, Reports filed with Registrar of Companies shall be preserved as prescribed under the respective rules made under the Companies Act, 2013



Documents prepared and submitted under other Acts / Rules

Documents to be preserved for a minimum period of 8 years from the end of financial year or completion of audit, assessment under the provisions of Income Tax Act, Excise and Service Tax Act are as under.

- (1) Income Tax Returns, Statement of computation of Income, Profits or gain etc.
- (2) TDS Returns with payment challan
- (3) Service Tax Returns with challan and Cenvat credit availed
- (4) Excise Duty Returns with challan and Cenvat credit availed

Preservation of various other records and period of preservation

Permanent in nature:

- i) Court Orders
- ii) Property documents with all evidences of ownership and insurance taken
- iii) Insurance policies
- iv) Records of pay-roll, bonus, gratuity paid etc.
- v) Internal memo of lasting consequences

For a period of Eight (8) years after termination of contracts / employment :

- i) Contracts related to purchase, sale, assets acquisition etc.
- ii) Contracts related to any projects
- iii) Time office records and Leave Card
- iv) Employees information and medical records
- v) Unclaimed wages and other benefits

For a period of Three (3) years after closure / settlement :

- i) Litigation files, after closure of litigation
- ii) Claims records after settlement and claim money received
- iii) Internal memo of routine matters having no significant impact

Disclosures of events or information to the Stock Exchange for a period of 5 years:

- i) Shall be maintained for a minimum period of 5 years from the date of making disclosure
- ii) Such disclosure posted on website also shall be maintained for said period and thereafter as per archival policy of the Company as disclosed on website

Records in Electronic Mode:

Electronic records as defined under Section 120 of the Companies Act, 2013 and Rule 27 of Companies (Management and Administration) Rules, 2014 and maintained by the Company shall be preserved in the manner prescribed under this provision.



Annexure II

Manner of disposal / discarding

The documents no longer considered important and specific period of preservation is over may be destroyed after making entry in Register of Disposal of Records in the manner mentioned hereunder :

Serial Number :

Nature of Documents, its Title, Period to which it relates :

Date and time of disposal :

Authorisation for disposal :

Mode of destruction :

