

MAHASHREE TRADING LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

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POLICY FOR PRESERVATION OF DOCUMENTS

The Policy for Preservation of Documents (the “Policy”) pursuant to Regulation 9 of the SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 (the “Listing Regulations”).

Objective

A policy on preservation of Documents would ensure safekeeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe Disposal / destruction of the Documents.

Definitions

Definitions or phases used in this Policy will have same meaning as in the Listing Regulations or Companies Act, 2013.

Policy for Preservation of Documents

The preservation of Documents shall be done in the following manner;

Corporate records are all paper or electronic records that are produced in functioning the duties of the Company.

Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.

Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is “Current”. All licenses and permissions to be preserved permanently.

If the Company requires that Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Legal Department advises otherwise.

In case of any other Document, for such period, as a competent officer of the Company required to handle or deal with the Document takes a considered view about its relevance; Provided that generally speaking, a Document may be preserved for a period of 3 years from the date on which the Document was originated.

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An indicative list of the Documents and the time-frame of their preservation is provided in **Annexure**.

Modes of preservation

The Documents may be preserved in
1 physical form or
2 Electronic Form.

The officer of the Company required to preserve the Document shall be Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law.

The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

Authority to make alteration to this policy

The Board is authorised to make alteration to this policy as considered appropriate, subject, however, to the condition that such alteration shall be in consonance with the applicable Acts and Regulations.

Destruction of documents:

The documents shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the documents are stored, after the prior specific approval of the Chief Financial Officer or the Executive Director or any other authority as required under the Applicable Law pursuant to which the documents have been preserved.

Annexure

Indicative list of documents to be preserved permanently and for at least eight years under the Companies Act 2013.

Documents to be preserved permanently:

- The Memorandum and Articles of the Company.
- Certification of Incorporation and subsequently amended certificates
- Books and Documents relating to issue of shares certificates
- Minutes Board/Committees and General Meeting
- Statutory Registers
- Scrutinizers' Report

Documents to be preserved for minimum period of eight years

- Annual Returns
- Annual Reports
- Board/Committee Agenda
- Circular Resolutions
- Notice of Board/Committee/ General meeting
- All notices pertaining to disclosure of interest of Directors
- Register of deposits
- Instrument creating of Charges or modification and Register of Charges
- Attendance Register
- Declaration of Directors
- Postal ballot and other all papers relating to postal ballot including voting by electronic means,
- Books of accounts and Tax Records

Documents under any other law:

All licenses and permissions to be preserved permanently. Other documents as per applicable period mentioned in the respective law.