



POLICY ON PRESERVATION OF DOCUMENTS

OF

LLOYDS ENTERPRISES LIMITED

CIN: L27100MH1986PLC041252

**Registered Office: A 2 2nd Floor Madhu Estate Pandurang Budhkar Marg
Lower Parel Mumbai 400013**

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POLICY ON PRESERVATION OF DOCUMENTS

1. Scope:

A policy on preservation of Documents (defined below) would ensure safe-keeping of the records and safeguard the Documents from getting mishandled, while at the same time avoiding overflow of inventory of Documents. The Board of Directors have therefore formulated this policy, pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, on preservation of the Documents to aid the Company in handling the Documents efficiently. It not only covers the various aspects relating to preservation of the Documents but also the safe disposal/destruction of the Documents.

2. Definitions:

- 2.1. "**Act**" means the Companies Act, 2013.
- 2.2. "**Applicable Law**" means any existing or new enactments, circulars, laws, rules, regulations issued by the Government of India/State Governments or laws enacted by any overseas country which has an impact on the Company's businesses as also rules, regulations or standards which are issued by any statutory bodies in India and governing the Company.
- 2.3. "**Authorized Person**" means any person duly authorized by the Board.
- 2.4. "**Board**" means the Board of Directors of the Company or any of the Committees constituted by it.
- 2.5. "**Company**" means LLOYDS ENTERPRISES LIMITED.
- 2.6. "**Current Documents**" means any document, that still has an ongoing relevance without limitation or reference to any ongoing litigation, proceedings, complaint, dispute, contract or the like matter.
- 2.7. "**Documents**" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, received or kept in pursuance of the act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form and does not include multiple or identical copies.
- 2.8. "**Electronic Records**" means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- 2.9. "**Electronic Form**" means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over or access thereto.
- 2.10. "**Maintenance**" means keeping documents, either physically or in electronic form.
- 2.11. "**Preservation**" means to keep in good order and to prevent from being altered, damaged or destroyed.

2.12. "**Regulations**" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

3. Coverage:

This Policy is intended to guide the Company and its employees on maintenance of any documents, their preservation and disposal.

4. Classification:

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- a. The documents of permanent nature (listed in Annexure - I) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- b. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in Annexure-II) shall be preserved by the Company for a term of not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term of not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

- c. Any other documents shall be preserved for such period, as a competent officer may require, taking into view, its relevance. Generally, a document may be preserved for a period of 5 years from the date on which the document originated.
- d. The documents pertaining to any ongoing litigation, proceeding, complaint, dispute, contract or any other like matter, where there is no such requirement as per the applicable laws, then such documents shall be preserved for such period till the subject matter is closed/completed/settled as the case may be or otherwise.
- e. Documents like License, Registration, and Permission etc., shall be preserved permanently, unless the relevant activities/matter is closed and no longer required in the future.
- f. Documents like Deed/Agreements/Ownership rights, etc. in relation to Immovable properties shall be permanently preserved unless such Immovable Properties are no longer properties of the Company.

Hosting on Company Website

The Company shall disclose on its website all such events or information which has been disclosed to the concerned Stock Exchanges and such disclosures shall be hosted on the website of the Company for a minimum period of 5 years and thereafter as per the archival policy of the Company.

5. Modes of Preservation:

5.1. The documents may be preserved in:

5.1.1. Physical form or

5.1.2. Electronic form.

5.2. The Officer of the Company, who is authorized to observe the compliance of this requirement under applicable laws, shall be responsible for the preservation of documents in accordance with this policy.

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

5.4. 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.

6. Custody of the Documents:

Subject to the applicable laws, the custody of the documents shall be with the Authorized Person. Where the Authorized Person tenders his/her resignation or is transferred from one location to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, other storage devices or such other Documents and devices in his/her possession under the Policy, to such other person, as the Board may authorize and deem fit to be the Authorized Person.

7. Authority to Board:

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted via the Regulations.

8. Authority to make alterations to the Policy:

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, to the conditions that, such alterations shall be in consonance with the provisions of the Acts and Regulations.

9. Destruction of Documents:

9.1. Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both Physical and Electronic Documents.

9.2. The temporary documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the Documents are

stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of documents may be destroyed as normal administrative practice are listed in Annexure - III.

- 9.3. A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.
- 9.4. The entries in the register shall be authenticated by the Authorized Person.

10. Conversion of the form in which the Documents are preserved:

- 10.1. The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
- 10.2. This will be done after obtaining prior approval of the Board.

11. Authenticity:

Where a Document is being maintained both in physical form and in electronic form, the authenticity with reference to the physical form should be considered for every purpose.

12. Interpretation:

In any circumstance, where the terms of this policy differ from any existing or newly enacted laws, rules, regulations or standards governing the Company, the laws, rules, regulations or standards will take precedence over these policies and procedures until such time as this policy is changed to conform to the laws, rules, regulations or standards.

ANNEXURE I
RECORDS TO BE PRESERVED PERMANENTLY

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.	Minutes Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
6.	Register and Index of Members
7.	Register of Contracts as per Companies Act, 2013
8.	Register of Charges as per Companies Act, 2013
9.	Register of Investments as per Companies Act, 2013
10.	Files relating to premises viz. Title Deeds/ Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
11.	Authorization / licenses obtained from any statutory authority
12.	Policies of the Company framed under various regulations
13.	Register of disposal of records
14.	Certificates obtained from various statutory authorities
15.	Register of Inter Corporate Loans and Investments as per section 186 of the Companies Act, 2013.
16.	Such other records as may be required under any law from time to time

ANNEXURE II
RECORDS TO BE PRESERVED FOR MINIMUM PERIOD OF 08 (EIGHT) YEARS

Sr. No.	Records
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Register of Debenture Holders or any other security holders along with the index from the date of redemption of debentures or securities.
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 subsection 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.	Copy of newspaper advertisement or publications
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

ANNEXURE III
RECORDS THAT MAY BE DESTROYED AS NORMAL ADMINISTRATIVE PRACTICE

Sr. No.	Records
1.	Catalogues
2.	Copies of press cuttings, press statements or publicity material; letters of appreciation or sympathy, or anonymous letters;
3.	Requests for copies of maps, plans, charts, advertising material (subject to Clause 9 and 10 of this Policy)
4.	Facsimiles where a photocopy has been made; telephone message;
5.	Drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 9 and 10 of this Policy)
6.	Routine statistical and progress reports compiled and duplicated in other reports (subject to Clause 9 and 10 of this Policy)
