

# MOHINDRA FASTENERS LIMITED

## POLICY ON PRESERVATION OF DOCUMENTS

### 1. PREAMBLE:

The Board of Directors of the Company its meeting held on May 28, 2016 has adopted a Policy with regard to preservation of documents in compliance with the requirement of Regulation 9 of Securities Exchange Board of India (Listing Obligation and Disclosures Requirement) Regulations, 2015 (“Listing Regulations”).

### 1.2 OBJECTIVE:

The policy is broadly frame for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business and to facilitate efficient and effective operation of our company.

### 2. DEFINITIONS

- a) Act: “Act” means the Companies Act, 2013 including any amendment or modification thereof.
- b) Board: “Board” means Board of Directors of Mohindra Fasteners Limited or its committee as constituted from time to time.
- c) Company: “Company” means Mohindra Fasteners Limited.
- d) Director: “Director” means a person as defined in Section 2(34) of the Companies Act, 2013 and presently appointed as a Director in the Company.
- e) Authorised person: “Authorised Person” means any person duly authorised by the Board.
- f) Compliance Office means Company Secretary of the Company.
- g) Document: “Document” means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.
- h) Preservation: “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.
- i) Employees: “Employees” shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.
- j) Key Managerial Personnel: “Key Managerial Personnel” shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.
- k) Regulations: “Regulations” shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015
- l) Secretarial Standards (SS): “Secretarial Standards” means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.
- m) Stock Exchange or Exchanges: “Stock Exchange or Exchanges” shall mean where the shares of the company are listed.
- n) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

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### 3. GOVERNING LAWS

This policy shall be governed by the Companies Act 2013, SEBI Act, Rules and Regulations, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

### 4. CLASSIFICATION OF DOCUMENTS/RECORDS

The Documents for which the policy has been made can broadly be classified in the two categories

- a) Documents whose preservation shall be permanent in nature (As mentioned in Annexure – A)
- b) Documents whose preservation shall be at least for 8 years (As mentioned in Annexure – B)

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. MFL 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.

Documents, that need to be preserved for a specified period as per Applicable Law, shall be preserved for such specified period. In case of Documents in respect of which no such period is specified under Applicable Law, they shall be preserved for the period as per business requirement of the Company.

The preservation of documents, as mandated under the Policy, shall apply to all documents regardless of its location, including all Company locations, computer storage or employees' laptops etc.

An indicative list of Documents and their preservation schedule is provided in Annexure A & B.

### 5. AUTHORITY AND RESPONSIBILITY

The Company Secretary and Chief Financial Officer of the Company will be responsible to deal with the record according to the time frame prescribed in the policy for preservation of records and further all staff and management of the Company shall assist in implementing the policy as appropriate to their respective roles and responsibility.

### 6. MODE OF PRESERVATION

Records/Documents may be preserved either in physical paper form or in Electronic Form or partly in physical paper form and partly in Electronic Form.

### 7. CUSTODY OF DOCUMENTS

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

### 8. DESTRUCTION OF RECORDS

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The records/ documents preserved shall be reviewed every year or according to the need of the respective departments and actions taken to destroy those records which are due for disposal.

The details of the Documents destroyed by the Company shall be recorded in the Register to be maintained by the company secretary or any other Person authorised by the Board within the respective department wherein the brief particulars of the documents destroyed shall be entered either in electronic form or in physical form in the format as prescribed in **Annexure C**.

### **9. REVIEW OF THE POLICY**

This Policy is framed based on the requirements of Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015. The Board of Directors may subject to applicable laws amend/substitute any provision(s) with a new provision(s) or replace this Policy entirely with a new policy.

In case of any subsequent changes in the Companies Act, 2013 or Regulations, which makes any of the provisions in the Policy inconsistent with the Regulations, the provisions of the Act or Regulations would prevail over the Policy and the provisions in the Policy would be modified in due course to make it consistent with law.



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### Annexure - C

#### REGISTER OF DOCUMENTS DESTROYED

Sr. No.	Particulars of Documents destroyed	Date and mode of destruction	Signature of Authorised Person