

PATEL INTEGRATED LOGISTICS LIMITED

*POLICY FOR PRESERVATION OF DOCUMENTS
PURSUANT TO REG. 9 OF THE SEBI
(LISTING OBLIGATIONS AND
DISCLOSURE REQUIREMENTS)
REGULATIONS, 2015*

1. INTRODUCTION

This Policy is called “PILL – Policy for Preservation of Documents ” (hereinafter referred to as “this Policy”) and shall be effective from 1st December, 2015 (“Effective Date”).

In terms of the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Regulations”), Patel Integrated Logistics Limited (hereinafter referred to as “the Company”) is required to frame a Policy for preservation of documents.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed off, if no longer needed and how the documents should be accessed and retrieved when they are needed.

2. CRITERIA FOR PRESERVATION OF DOCUMENTS

The 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 clause (a) and (b) in electronic mode.

3. PRINCIPLE OF RESPONSIBILITY OF EMPLOYEES FOR RESERVATION OF DOCUMENTS

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

4. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

In case the Company is served with any notice for request of documents or any governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

5. STATUTORY REQUIREMENTS

If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

6. AMENDMENTS TO THE POLICY

The Company is committed to continuously reviewing and updating our policies and procedures. Therefore, this policy is subject to modification. Any amendment of any provision of this policy shall be carried out by persons authorized by the Board in this regard.

ANNEXURE

A. Documents whose preservation shall be permanent in nature:

1. Register of members commencing from the date of registration of the Company;
2. Index of members;
3. Memorandum and Articles of the Company and other incorporation documents;
4. Trademark, Patent and copyright registrations;
5. Financial Statements including Balance Sheet and Profit & Loss A/c and Audit Reports and Secretarial Audit Reports;
6. Deeds, mortgages, sale agreements;
7. Property documents / records and depreciation schedules;
8. Loan documents and promissory notes;
9. Provident Fund / Pension Records;
10. Tax Returns (Direct and Indirect Taxes);
11. Order of change of registered office if any;
12. Resolution for change in object clause in the Memorandum;
13. Orders of Amalgamation or any other Court, or authority under the Companies Act;
14. Statutory Registers under Companies Act, 2013.
15. Any other documents which Board of Directors of the Company may deem fit and proper to preserve the same permanently.

B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions or events:

1. Unaudited Quarterly/half yearly financial results, balance sheet, and profit and loss accounts, cash flow statements;
2. List of Unclaimed dividend;
3. Compliance Certificates under various Acts, Statutes applicable to the Company;
4. Bank Statement, Bank deposit records, electronic funds transfer evidence, reconciliation statements and vouchers;
5. Invoices (to customers, from vendors);
6. Fixed Deposits records;
7. Purchase Orders and sales records;
8. Payroll records, employee TDS records, attendance records, leave records, etc.;
9. CSR Records;
10. Insurance Records, including policies and claims;
11. Legal files, deeds and contracts
12. Any other documents which Board of Directors of the Company may deem fit and proper to preserve the same for not less than eight years.