

POLICY FOR PRESERVATION OF DOCUMENTS

ASHUTOSH FIBRE LIMITED

(FORMERLY KNOWN AS ASHUTOSH FIBRE PRIVATE LIMITED)

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Introduction:

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Listing Regulations") and Companies Act, 2013. SEBI has mandated all the listed entities to have a policy on Preservation of Documents. Archival Policy as referred to in Regulation 30 (8) of the Listing Regulations forms part of this Policy. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of Companies Act, 2013.

Purpose:

The purpose of this documents to present a high level policy statement for **Ashutosh Fibre Limited** ("the Company") regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 ("the Act"), SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Regulation") and any other applicable laws to the Company.

Accordingly, the Policy named Policy for Preservation of Documents ("the Policy") has been formulated and adopted by the Board of Directors ("the Board") of the Company.

Definitions:

- i. "Company" means Ashutosh Fibre Limited
- ii. "Board" means the board of directors of the Company or its Committee.
- iii. "Documents" means as defined in sub- section 36 of section 2 of the Companies Act, 2013
- iv. "Electronic Records" means as defined in Information Technology Act, 2000 or as amended from time
- v. "Electronic Form" means as defined in Information Technology Act, 2000 or as amended from time
- vi. "Listing Regulations" means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015
- vii. "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- viii. "Policy" means this Policy of Preservation of Documents of the Company.
- ix. "Records" in relation to this policy includes accounting records, books or papers and books and papers as defined in sub-section 12 of section 2, books of accounts as defined in sub-section 13 of section 2 of the Companies Act, 2013, statutory and other documents of material significance whether covered under this Policy or not. Any other term not defined herein shall have the same meaning as described to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company



Objectives:

The Policy has been formulated and adopted by the Board for achieving the following objectives;

- ⇒ To provide guidance for preservation of Documents to the executives and staff working in the Company;
- ⇒ To create awareness amongst executives and staff working in the Company of importance of preservation of documents for making critical decisions and undertaking other activities that may have an impact on the operations of the Company;
- ⇒ To retain and preserve its documents as the basis for communication with a range of external stakeholders;
- ⇒ To have systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business;
- ⇒ To ensure that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources

Policy Statement:

The policy contain 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 of, if no longer needed and how the documents should be accessed and retrieved when they are needed

Authority And Responsibility

The Compliance Officer, as designated by the Board of the Company in this behalf, shall be responsible for the preservation of the records according to the time frame prescribed in the Policy for their preservation. All staff and management of the Company shall assist in implementing this Preservation Policy as appropriate to their roles and responsibilities.

Preservation Of Documents:

In accordance with Regulation 9 of the Listing Regulations, documents which the Company is required to preserve under the Applicable Laws, shall be classified under the following categories and shall also be preserved as mentioned against each category: -

- a) Documents whose preservation shall be permanent in nature: Documents, which are required to be preserved permanently, by the Company as per Applicable Laws, shall be preserved permanently, in accordance with the provisions of the Applicable Laws.
- b) Documents with preservation period of not less than eight years after completion of the relevant transactions: Documents, which are required to be preserved by the Company for not less than eight years as per Applicable Laws, shall be preserved for eight years for the relevant date or after completion of the relevant transactions, in accordance with the provisions of the Applicable Laws.



- c) Documents with preservation period of less than eight years after completion of the relevant transactions: Documents, which are required to be preserved by the Company for less than eight years as per Applicable Laws, shall be preserved for such period as may be prescribed in accordance with the provisions of the Applicable Laws.
- d) Documents pertaining to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter, where there is no such requirement as per 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 future.
- f) Documents like Deed/Agreements /Ownership right etc in relation to Immovable properties shall be permanently preserved unless such Immovable Properties is no longer properties of the Company.

Manner Of Preservation:

Documents may be preserved in physical or electronic mode as may be permitted by law. All the possible measures must be taken to ensure the data is secure and safe as the case may be. The Company must take possible/ feasible steps so as to prevent the documents from being damaged / mutilated/ altered/ destroyed. If the documents are in electronic mode, necessary care must be taken to avoid corruption of files and also should have proper back-up of electronic records. 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 Officer of the Company, who is authorised to observe the compliance of requirement of respective Applicable Laws and rules, regulation thereunder etc. as the case may be, shall be responsible for the preservation of the Documents in accordance with this policy.

Modification Of Policy:

In case of any amendments to the Regulations which makes any of the provisions in the Policy inconsistent, the provisions of the Regulations shall prevail. Further, in case there are any regulatory changes, which require modifications to the Policy, shall be reviewed and amended with due approval from the Managing Director of the Company.

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