

Damodar Industries Limited

Reg. Off. 19/22 & 27/30, Pandurang Budhkar Marg, Worli, Mumbai – 400 013

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POLICY FOR PRESERVATION OF DOCUMENTS OF DAMODAR INDUSTRIES LIMITED

(Adopted by the Board of Directors on November 8,2015 which will be effect from December 1, 2015)

The Board of Directors (“The Board”) of Damodar Industries Limited (“Company”) has adopted the following policy and procedures with regard to Preservation of documents as defined below.

OBJECTIVE: The policy is framed pursuant to the provision of Regulation 9 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulation, 2015.

INTRODUCTION: A documents preservation policy involves the systematic identification, categorization maintenance, review, retention and destruction of documents received or created in the course of business. The focus of the policies on the following points:

1. Identification of the Documents to be maintained
2. Period of retention for retained and disposal of documents.
3. Accessibility/retrieval of documents.

DEFINITIONS:

Act: means the Companies Act, 2013

Board of Directors: Board of Directors of Damodar Industries Limited

Documents: means Documents as defined in sub section 36 of section 2 of the Companies Act,2013.

Documents includes Summons, Notice, Requisition, Order, Declaration, form and register, whether issued, sent or kept in pursuant of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.

Maintenance: means keeping register and records physically or in electronic mode as may be permitted under any law for the time in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such entries and the preservation of such registers and records.

Preservation: means to keep in good order, to prevent from being damaged or destroyed.

Register: means a register maintained under the Companies Act, 2013.

SEBI: Security and Exchange Board of India.

SEBI (LODR) Regulation, 2015: means SEBI (Listing Obligation and Disclosure Requirements), Regulation 2015.

Compliance Officer: The company Secretary and/or Key Managerial person appointed by the Board of Directors of the company as the Compliance officer for the purpose of these regulations from time to time.

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

The Board of Directors has adopted the following policy with regard to permanent preservation of documents:-

1. Annual Returns filed with Registrar of Company Affairs.
2. Minutes of all General Meetings, Board & Committee Meetings.
3. Disclosure made under the SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI (substantial acquisition of shares and takeovers) regulations 2011 to stock Exchange from time to time.
4. Shareholders and Joint venture Agreement.
5. Letter of Offer related to public issue, Right Issue, Further Issue, buy back offer etc.
6. Agreement with share Transfer agents & Depositaries.
7. Any others, if Board of Directors may think deemed fit.
8. Register maintained as per Section 81,85,88,170,186,187,188,189 of the Companies Act, 2013 and 397 Rule (7).

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS COMPLAINE:

- a. Books of Account and Financial Statements, Quarter and half yearly results and Annual Reports.
- b. Notice of the Board Meetings, date for book closures and Records dates.
- c. Quarterly Shareholding pattern including details of Lock in shares and Pledge shares.
- d. Results of E-voting, General Meeting, Postal Ballot, Scrutinizer Report etc.
- e. Dividend Register & Records and List of Unpaid Dividend to the shareholders.
- f. Proxies and Proxy Register.
- g. Disclosure of Interest by Board of Directors.
- h. Register of Directors' Attendance.
- i. Register of Member's Attendance.
- j. Register and records of Postal Ballot.
- k. Register of Inspection.
- l. Register maintained as per Section 128,73 and Rule 14 of Companies (Acceptance of Deposit) Rules, 2014 of Companies Act, 2013.
- m. Declaration/Certificates received under Code of Conduct.
- n. Financial Documents in respect of Borrowing.
- o. Contract, Agreement and Sub Contracts related to work.
- p. Corporate Governance Report.

PRESERVATION OF CORPORATE POLICES:

The Company shall preserve permanently various policies framed under Companies Act,2013 and SEBI regulation from time to time:

1. Code of Conduct for Board of Directors and Senior Management
2. Corporate Social responsibility policy
3. Policy for determining Material Subsidiary
4. Related Party Transaction Policy
5. Risk Management Policy
6. Remuneration policy
7. Whistle Blower Policy
8. Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders.
9. Policy on Materiality of Events.

RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS:

The key Managerial Personnel or any other person, authorized by the Board of Director of the Company and it is responsibility of respective director and Heads of all Department/ Business head to ensure the implementation of the policy.

SECURITY OF DOCUMENTS:

The Board shall ensure that all documents shall be keep in safe place in the Company premises. The Board may authorized person for the security of documents, who shall be responsible for safe custody of documents.

DISPOSAL OF DOCUMENTS & AMENDMENTS:

Disposal of documents after said period of 8 years shall be done in presence of Authorized person in method prescribed by the Board of Directors. Before disposing a soft copy shall be taken for the records.

AMENDMENT:

The Board shall have the power to amend any of the provisions of this policy, substitute any of the provision with a new provision or replace this policy entirely with a new Policy according to subsequent amendments/ Modification to Regulation.