

INDUSTRIAL AND PRUDENTIAL INVESTMENT COMPANY LIMITED

CIN: L65990WB1913PLC218486

POLICY ON PRESERVATION OF DOCUMENTS

1. BACKGROUND

The Company is governed by many statutes for preservation of documents and records. They are:-

- a. Companies Act, 2013
- b. Income Tax Act, 1961
- c. RBI regulations for NBFC accepting deposits and money laundering regulations
- d. SEBI (Listing Obligations and Disclosure) Regulations, 2015.(LODR)

2. OBJECTIVE

The objective of this policy is to comply with Regulation 9 of Chapter V of LODR.

As per Regulation 9 of LODR, the Company 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:

Under the era of digitalisation, the above Acts and Regulations permit preservation of documents in electronic mode with necessary safeguard. The Board of Directors has approved this policy at its meeting held on 12th August, 2022.

3. DEFINITIONS

- a. **"Applicable Laws"** means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.
- b. **"Board"** means the Board of Directors of the Company.
- c. **"Company"** means Industrial & Prudential Investment Company Limited
- d. **"Document(s)"** 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 Laws 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
- e. **"Electronic Record(s)"** means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- f. **"Electronic Form"** with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, microfilm, computer generated micro fiche or similar device;
- g. **"Listing Regulations"** means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and includes other regulations, guidelines, circulars, orders and rules issued by SEBI/BSE to the listed companies.
- h. **"Policy"** means this policy, as amended from time to time.

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- i. **"Preservation"** means to keep in good order and to prevent from being altered, damaged or destroyed.
- j. **"SEBI"** means the Securities and Exchange Board of India.
- k. **"Rules"** means the rules made under the Companies Act, 2013.
- l. **"Stock Exchange(s)"** means BSE Limited where the equity shares of the Company are listed.

4. PURPOSE & SCOPE

The purpose of this Policy is to ensure that necessary records and documents of the Company are adequately protected and maintained and to ensure that records that are no longer needed by the Company or are of no value are discarded at the proper time. The Company understands that records form an essential and significant part of the Company's resources.

5. POLICY

- a. Documents whose preservation shall be permanent in nature as per Applicable Laws, shall be preserved permanently.
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions per Applicable Laws, shall be preserved for eight years for the relevant date or after completion of the relevant transactions.
- c. Documents with preservation period of less than eight years after completion of the relevant transactions as per Applicable Laws, shall be preserved for such period.
- 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.

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- 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.

6. MANNER OF PRESERVATION

- ❖ Documents in physical or electronic mode as may be permitted by law shall be preserved with all the possible measures to ensure the data is secure and safe as the case may be.
- ❖ Company shall 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 shall be taken to avoid corruption of files and also should have proper back-up of electronic records
- ❖ The preservation of Documents shall be preserved as to ensure that there is no tampering, alteration, destruction, or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- ❖ The Company Secretary 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.

7. POLICY REVIEW

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or

modification shall be inconsistent with the applicable provisions of any law for the time being in force.

8. SCOPE AND LIMITATIONS

In the event of any conflict between the provisions of this Policy and the Act or Listing Regulations or any other statutory enactments or rules, the provisions of Listing Regulations/Act or statutory enactments or rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.