

# MENON PISTONS LIMITED

Governance Series

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## POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

[Regulation 9 and 30 (8) (a) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

## **Introduction**

As per Regulation 9 and Regulation 30 (8) (a) of the Regulations of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**the Regulations**") the Menon Pistons Limited ("**the Company**") has adopted a policy namely "Policy on Preservation and Archival of Documents" ("**the Policy**").

The Policy ensures that all the necessary documents and records of the Company are adequately protected, preserved and disposed-off as required under various statutes, laws, rules, regulations for the time being in force. The Policy also governs the archival of documents hosted on the website of the Company.

## **Scope**

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

## **Objective**

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same.

The major objectives of the policy are:

- To identify statutory records to be preserved.
- To identify records to be maintained either for a period of eight years or permanently.
- To decide the mode of preserving the documents, whether in physical form or in electronic form.
- To decide the procedure to destroy the documents after eight years or other applicable period,
- To help employees understanding their obligations in retaining and preserving the documents and records.

## **Definitions**

**"Act"** shall mean the Companies Act, 2013, rules framed there under and any amendments thereto.

**"Applicable Law"** means any law, rules, circulars, guidelines, notification or standards under which the preservation of Documents has been prescribed.

**"Documents"** means all papers, certificates, records, registers, agreements, contracts, notices, orders, declarations, files, forms, books, letters, electronic forms and letterheads, tapes, CDs, DVDs, electronic storage devices etc., as required to be maintained under various law and regulations for the time being in force and Company's Policies.

**"Electronic form"** with reference to information means, any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

**"Preservation"** means to keep in good order or to prevent from being damaged or destroyed.

**"Regulations"** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

All other words and expressions used but not defined in this policy but defined in the SEBI Act, 1992, Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 and / or the rules and regulations made thereunder shall have the same meaning as respectively assigned to them in such acts or rules or regulations or any statutory modification or re-enactment thereto, as the case may be.

## **The Policy for Preservation of Documents**

1. Documents and Records of the Company required to be maintained under the Listing Regulations shall be classified in two categories as below:
  - a. Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time - **Annexure A**
  - b. Other Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time - **Annexure B**
2. The Company may keep the listing documents and records as specified above in electronic mode.
3. The Registrar and Share Transfer Agent shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained by them.
4. All departments of the Company shall ensure that the documents pertaining to their department are preserved as per the Policy. It shall be the duty of the Heads of Department ("**HOD**") to ensure that they comply with the requirements of the Policy.

## **Destruction of Documents**

The documents which are not required to be maintained and preserved permanently may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional/Departmental Heads.

## **Amendment**

The Board shall have power to amend any of the provisions of the Policy, substitute any of the provisions with a new provision or replace the Policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to the Regulations.

## **The Archival Policy**

As per Regulation 30(8) of the Listing Regulations, the Company is required to disclose on its website all such events or information which is to be disclosed to the Stock Exchanges pursuant to this Regulation. All such disclosures shall be archived as per the Company's Policy. Any disclosure of events or information which have been submitted by Menon Pistons Ltd, to the Stock Exchange under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 3 years.

### **A) Documents maintained in physical form:**

1. All information and/or documents pertaining to current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
2. All documents pertaining to the period prior to one preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation in Annexures attached hereto. The said records be also maintained in such a manner that their retrieval is easy and quick.

### **B) Documents maintained in electronic form:**

1. All documents pertaining to current financial year and for one preceding financial year shall be maintained on server and Backup be maintained on scheduled time and day. The documents shall be maintained in such a manner that their retrieval is easy and quick.
2. Back up of all documents pertaining to the period prior to one preceding financial year shall also be maintained on server, in good condition at least up to the minimum period specified for their maintenance / preservation. The said records be also maintained in such a manner that their retrieval is easy and quick.

## Annexure – A

### **Documents whose preservation shall be permanent in nature**

<b>Sr. No.</b>	<b>Particular</b>
1.	Documents and information filed with ROC for Incorporation of the Company
2.	Common seal, certificate of incorporation and certificate of change of name (if any), Certificate for commencement of business (if any)
3.	Memorandum of Association and Articles of Association as amended from time to time.
4.	Agreements made by the Company with the Stock Exchanges and Depositories etc.
5.	Minutes Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013 and the Regulation
6.	Statutory registers required to be maintained under various applicable laws, Cancelled Share certificates
7.	Licenses and permissions, Order from Courts and any other regulatory authorities
8.	Any other documents as may be required to be maintained in terms of applicable law(s) and preserved from time to time

## Annexure – B

### **Documents whose preservation is not permanent in nature**

<b>Sr. No.</b>	<b>Particular</b>	<b>Preservation Period</b>
1.	Annual Returns	8 years from the filed with the MCA
2.	Attendance Register of Board/General Meeting	8 years
3.	Income tax papers	8 years from the end of Financial Year or completion of assessment under income tax, whichever is later
4.	Notices of Board/Committee/General Meetings /other such meetings and supporting documents all other	8 years from the date of meeting
5.	Employees Information Records	8 years after resignation/ separation
6.	Disclosure of interest by the Directors	8 Years
7.	Instrument creating a charge or modification	8 Years
8.	Books of accounts and financial statements etc.	8 Years
9.	Any other important documents including prescribed under applicable laws.	8 Years