



**POLICY ON
ARCHIVAL AND PRESERVATION
OF DOCUMENTS**

APPROVED BY THE BOARD OF DIRECTORS ON 10.11.2017

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1. Background

The Company recognizes that the documents (defined later) generated and received, whether in physical or electronic mode, by its employees or others associated with the Company forms an important and integral part of the Company's records. The preservation of documents and their access, retrieval and authentication is important in order to conduct the Company's business effectively. Further various applicable laws prescribe certain conditions including minimum timelines, manner of preservation etc. The Documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information.

2. Applicability

This Policy is applicable to all documents maintained in physical and electronic mode by the Company and its subsidiaries. However this policy applies to the subsidiaries of the Company upon its approval by the Board of Directors of the respective Subsidiary Company. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents. The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

3. Objectives of the policy

This Policy contains guidelines for identifying documents that need to be maintained, the period of preservation of such documents and its destruction/disposal. This Policy aims to provide efficient and systematic control on the periodicity and destruction of business related documents.

4. Definitions

4.1. "Act" means the Companies Act, 2013.

4.2 "Applicable Law" means any law, rules, regulations, circulars, guidelines or standards issued by the Ministry of Corporate Affairs (MCA) and The Institute of Company Secretaries of India (ICSI) under which the preservation of Documents has been prescribed.

4.3 "Authorized Person" means any person authorized by the Board.

4.4 "Board" means the Board of Directors of the Company.

4.5 "Company" means Nuziveedu Seeds Limited or NSL.

4.6 “Documents” 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 law, whether issued, sent, received, or kept in pursuance of the Act or under any law for the time being in force or otherwise, maintained on paper or in electronic form and does not include multiple or identical copies.

4.7 “Electronic records” means the electronic record as defined under clause(t) of sub section (1) of Section 2 of the Information Technology Act, 2000 which is reproduced as follows:

"Electronic record" means data, record or data generated, image or sound stored, received or sent in an electronic form or micro film or computer generated micro fiche;

4.8 “Maintenance” means keeping documents, either physically or in electronic form.

4.9 “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

4.10 “Subsidiary Company” means a company in which NSL owns either directly or indirectly more than 50% equity share capital.

The words and phrases used in this policy and not defined here shall derive the meaning from the Applicable law.

5. Roles & responsibilities

The respective departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

6. Preservation of documents

6.1 The preservation of documents shall be as follows:

Particulars	Preservation Period
Documents listed in Annexure A	Permanent
Documents listed in Annexure B	Till such time lines given in the annexure

Any other document, which is not listed in Annexure A or B, shall be preserved and maintained for a period of 5 years from the date on which the document was originated or 3 years from the expiry of the document, whichever is later.

7. DESTRUCTION OF DOCUMENTS

7.1 The documents other than those mentioned in Annexure A, which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the preservation period in such mode and with the approval of the respective Functional Head. Any deviation to this shall be approved by Chief Financial Officer (CFO) or Company Secretary (CS).

7.2 The documents may be destroyed as follows:

- a) Shred or otherwise render unreadable
- b) Delete or destroy electronically stored data

7.3 A register of the documents disposed/destroyed in relation to the documents mentioned in clause 6 shall also be maintained. It shall state the brief particulars of the documents destroyed, date of disposal/destruction and the mode of destruction. The entries in the register shall be authenticated by the respective functional head or CS or CFO of the Company or any other person authorized by the Board in this regard. The format of the register has to be in accordance with **Annexure C**.

8. ARCHIVAL POLICY

Any document which has been uploaded on the Company's website under any law, it shall be made available on the website of the Company for a period of 5 years from the date of the document.

9. INTERPRETATION

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company from time to time.

10. AMENDMENT

This policy may be changed, amended, edited or substituted only by the Board of Directors of the Company.

ANNEXURE A

INDICATIVE LIST OF DOCUMENTS TO BE PRESERVED PERMANENTLY

NO	NAME OF THE DOCUMENT
1	Memorandum and Articles of Association
2	Certificate of Incorporation
3	Certificate of Commencement of Business
4	Minutes of the Board Meeting and Committee Meetings
5	Minutes of the Shareholders Meetings
6	Register and Index of Members
7	Listing Agreement executed with the stock exchanges, if any
8	Register of investments in securities not held in the name of the Company (MBP-3)
9	Register of renewed and duplicate certificates
10	Register of contracts with related party and contracts and Bodies etc., in which a Director is interested (MBP-4)
11	Register of Directors, Managing Director, Manager and Secretary
12	Register of Directors Shareholding
13	Register of transfer of shares
14	Register of Transmission of shares
15	Register of Charges (CHG -7)
16	Register of loans, guarantee, security and acquisition made by the Company (MBP-2)
17	Audited Financial Statements
18	Forms filed with Registrar of Companies (ROC)
19	Excise Returns, Income Tax Returns, Sales Tax Returns, Service Tax Return
20	Intellectual Property Rights (IPR) Registrations / Titles
21	Register of documents disposed /destroyed
22	Register of Debentures
22	Register of Deposits

ANNEXURE B

INDICATIVE LIST OF DOCUMENTS TO BE PRESERVED FOR A SPECIFIC PERIOD

No	Name of the document	Preservation period
1	Proof of sending and delivery of draft of the circular resolution and the necessary papers	3 Financial years
2	Attendance Register – Board and Committee Meetings	8 Financial years from the date of last entry made therein
3	Proof of sending notice of the Board and Committee meetings and their delivery	3 Financial years
4	Proof of sending agenda and notes on agenda of the Board and Committee meetings and their delivery	3 Financial years
5	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years
6	Annual Returns	8 Financial Years
7	Correspondence with shareholders	8 Financial Years
8	Postal Ballot forms	8 Financial Years
9	Scrutinizers Report	8 Financial Years
10	Newspaper cuttings of notices of Board Meeting and Financial results	8 Financial Years
11	Certified True Copy of Resolutions	8 Financial Years
12	Proof of sending draft minutes of the Board and Committee meetings and its delivery	3 Financial years
13	Proof of sending signed minutes of the Board and Committee meetings and its delivery	3 Financial years
14	Proof of sending notice of the General meeting and its delivery	3 Financial years
15	Engagement letters from Auditors/Vendors etc.	8 Financial Years
16	Investor Meet Presentations	8 Financial Years
17	Books of Accounts, Ledgers & Vouchers	8 Financial Years

No	Name of the document	Preservation period
18	Investment Records	8 Financial years from the date of redemption
19	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax, Service tax	8 Financial years
20	Contracts/Agreements	3 years following the expiry or termination of the contract/agreement
21	Litigation Documents	3 years from the final closure of the litigation.

ANNEXURE – C

FORMAT OF THE REGISTER OF DOCUMENTS DISPOSED/DESTROYED

No	Particulars of the document	Applicable law under which maintained	Date of destruction	Mode of destruction	Initial of the authorized person/CS/CFO