INANI SECURITIES LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

Legal Framework:

Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, provides that:

The listed entity 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:

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

Policy:

Taking into account the aforesaid applicable provisions, the Board of Directors of INANI SECURITIES LIMITED ('the Company') has framed the Policy for Preservation of Documents which is as under:

1. **Definitions:**

In this Policy, unless the context otherwise requires:-

"**Company**" means INANI SECURITIES LIMITED.

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

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

Words and expressions used in this Policy but not defined shall have the meaning as given in the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.

Any subsequent modification and/or amendments brought about by SEBI in the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 shall automatically apply to this Policy.

2. Purpose of the Policy:

The purpose of this document is to present a policy statement for INANI SECURITIES LIMITED ("the Company") regarding preservation of its documents in accordance with all the statutory and regulatory provisions applicable to the Company including the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. Further, the purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same.

3. Classification of Documents to be preserved / retained :

This policy shall be governed by the Companies Act 2013, SEBI Act, Rules and Regulations, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

i. Documents shall be classified in the following categories:

   a) Mandatory under governing laws

   b) Non-Mandatory

ii. Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.

iii. All records and documents as provided herein shall be preserved for such time and period as may be provided herein.

iv. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

4. Preservation of Documents/records:

Subject to **clause 3** above, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of

the general guidelines affecting document retention identified above, as well as any other pertinent factors as the overseeing authorities deem fit.

a. **Tax & Accounting Records:** Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Company's revenues and expenses including capital expenditure. Tax records should be retained for at least eight years from the date of filing the applicable return or such period of time as prescribed under Tax laws whichever is later.

b. **Employment Records/Personnel Records:** Labour laws require the Company to maintain certain recruitment, employment and personnel information. The Company should also maintain personnel files that reflect performance reviews if any and any complaints brought against the Company or individual employees under applicable labour laws. The Company should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file.

   - Employment and personnel records shall be preserved for a minimum period of eight years irrespective of whether such employee continues to be employed with the Company or not.

   - Individual employee files need to be maintained as long as the concerned individual remains an employee of the Company as also for a minimum period of 5 years thereafter or such period of time as prescribed under respective laws for time being in force whichever is later.

   - Returns under various labor laws, governmental and statutory filings etc. need to be retained in accordance with the related statute as may be specified therein or for a minimum period of 8 years whichever may be later.

c. **Financial Statements, Minutes, Statutory Registers & other Documents:** Financial Statements including Audit Reports, Minutes of Meetings of Board, Members and other Committees Meeting along with statutory registers as prescribed under governing laws for time being in force shall be preserved on permanent basis. Any document where preservation period is not prescribed under governing laws shall be preserved for a minimum period of eight years.

d. **Press Releases/Public Filings:** The Company should retain copies of all press releases and documents filed with Stock Exchanges, Registrar of Companies and other regulatory authorities on a permanent basis.

e. **Legal Files / documents:** All legal documents / copies of notices / summons / orders / judgments and all other legal documents shall be preserved permanently. Documents like leases, Leave & License agreements and other agreements shall be preserved for atleast 5 years beyond the life of the said documents.

f. **Contracts:** Final executed copies of all contracts entered into by the Company should be retained. The Company should retain copies of the final contracts for at least five years beyond the life of the agreement.

5. Periodical Review of the Policy by the Board of Directors:

This policy shall be reviewed periodically by the Board to comply with any amendments if any, in the applicable laws, rules and regulations.

6. Administration:

The Administration of the policy shall lie with the Board of Directors. The Board at its discretion shall delegate the responsibility of implementing the policy to the Company Secretary or any other suitable personnel who shall administer the same under the supervision and guidance of the Board and with the coordination and assistance of the personnel from all the departments of the Company.

7. Suspension of Disposal of Documents in the event of Litigation or Claims:

In the event of service of Legal Notice on the Company by any Court or any government or law enforcement agency for the production of any document, then the disposal of the said documents shall be suspended till such time the requirement of the documents by the courts etc. are dispensed with and as may be ascertained by the Board of Directors.

8. Register of Documents destroyed:

The company shall maintain a register in the form set out in the ***Annexure*** enclosed hereto wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Company Secretary or such other persons as may be authorized by the Board for the purpose.

9. Policy Severable:

This Policy along with Annexure constitutes the entire document in relation to its subject matter. In the event that any term, condition or provision of this Policy is being held to be in violation of any applicable law, statute or regulation, the same shall be severable from the rest of this Policy and shall be of no force and effect, and this Policy shall remain in full force and be effective as if such term, condition or provision is not in existence since the inception of the Policy.

Annexure:

Register of Documents destroyed:

Sl.No.	Particulars of Documents disposed of/destroyed	Date of disposal/destruction of the documents	Authorized Signature

Reviewed on: 13th February 2021 **Managing Director**