



ADHIRAJ DISTRIBUTORS LIMITED

(CIN No. U52190WB2011PLC158320)

Central Plaza, 41, B.B. Ganguly Street, 2nd Floor, Room No. 13-B, Kolkata 700 012

Phone: +91 33 4000 6334 • Email: info@adhirajdistributors.com • Website : www.adhirajdistributors.com

POLICY ON PRESERVATION OF DOCUMENTS UNDER SEBI –LODR (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATION, 2015

PREAMBLE:

The Board of Directors of Adhiraj Distributors Limited (“the Company”) adopted a policy for preservation of Documents under “Regulation 9” of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.

This policy shall be known as “Policy for Maintenance and Preservation of Documents”

PURPOSE OF THE POLICY

The purpose of this policy is to establish the framework needed for effective management of Documents and set of principles for company approach to preserve them.

This policy seeks to ensure that all the necessary documents and records of the company either in physical or in electronic mode 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. This Policy is also for the purpose of aiding employees of the company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

This Policy is framed as per requirement of regulation 9 of SEBI (Listing Obligation and Disclosure Requirement) Regulation 2015.

DEFINITION

- a) “Documents” means all business records of the company in written, printed and recorded matter and electronic forms of records and includes summons, notice , requisition, order, declaration , form and register , whether issued, sent or kept in pursuance of the companies Act 2013 ,SEBI Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- b) “Company” means Adhiraj Distributors Limited.
- c) “Employee” shall mean the employees and office bearers of the company, including but not limited to whole time Director.
- d) “Regulation” shall mean SEBI (Listing obligations and disclosure Requirements) Regulation 2015.

Rachana Kumari



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- e) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and disclosure Requirements) Regulation 2015, companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

MAINTAINENCE OF DOCUMENTS

Every employee of the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transaction and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed relevant time limit.

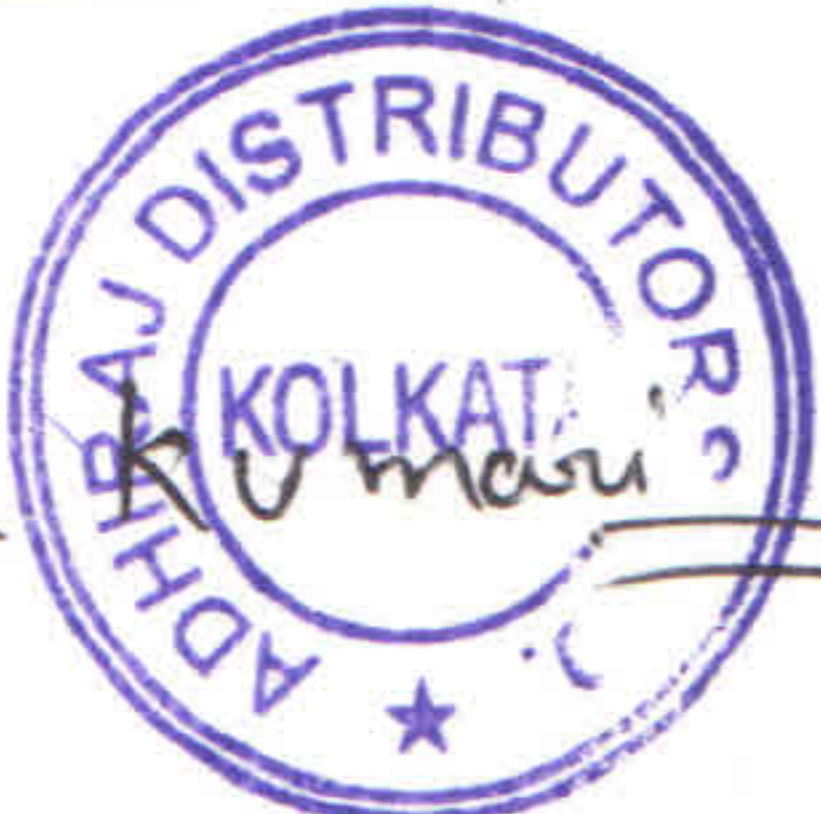
- Digital documents can be maintained in forms such as emails, web pages or database records, plus scanned version of papers that have been digitised in Business Processes.
- Physical documents to be maintained in books and files.
- All digital and physical records to be saved at the registered office of the company and no physical records can be migrated without permission of the respective Department Head.

DISPOSAL AND DESTRUCTION OF DOCUMENTS

All documents mentioned in category A which are permanent in nature and need to be permanently preserved by the company during its entire life time. Utmost care is to be taken to ensure that files are well preserved. However, all documents mentioned in category B are temporary in nature must be preserved for a period not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed.

The company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Department Head for the purpose. Inspection of this register is restricted.

Sl. no.	Category A	Category B
1.	Statutory registers and records maintained under the companies Act, 2013	VAT/ Sales tax Records
2.	Annual Report, Director Report , Auditors Report, secretarial Report and other such report as required	Tax deducted at source Records

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3.	Minutes Books, Notices Agendas and other related papers of Board Meeting, General Meeting and Committee Meetings	Income Tax Papers
4.	All documents required under the Listing Agreement	Books of Accounts
5.	Documents Pertaining to NSDL, CDSL, SEBI, and Stock Exchange.	Bank statement and other related documents
6.	All e-forms and other documents as required to file with Registrar of Companies and other regulatory Authorities.	Non statutory registers under the Companies Act, 2013.
7.	Records of all Contract and arrangement if any.	Annual Plans and Budgets
8.	Memorandum of Association, Articles of Association, Share certificates, adoption policies, codes and other related documents.	Employees record
9.	Orders and approvals of all regulatory authorities	Other miscellaneous documents as may required
10.	Disclosure, Declarations as required Under Companies Act, 2013, Listing Agreement, SEBI (Prohibition of insider Trading) Regulations, 2015, SEBI (Substantial Acquisition of shares and Takeovers) Regulation, 2011 and other such regulation as may required.	

GENERAL

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.

AMENDMENT:-

Any change in this Policy shall be approved by the Board of Directors of the Company. in case of any amendment (s), clarification (s), circulars(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification (s), circular(s) etc.

Rachana

