

POLICY FOR PRESERVATION OF DOCUMENTS OF KAJARIA CERAMICS LIMITED

1. PREAMBLE

In pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), formulates the policy on preservation of the Documents to aid the employees in handling the Documents efficiently.

The main purpose of the policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in at least two following categories as follows:

1. Documents whose preservation shall be permanent in nature;
2. Documents with preservation period of not less than eight (8) years after Completion of the relevant transactions.

The Company shall keep documents specified above in electronic mode.

2. TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The Company shall maintain and preserve the documents, as specified hereunder :

Category (A): The documents of permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

Category (B): The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in Annexure-2) subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

For the purpose of this policy, document may include the following:

- i. 'books and papers' as defined in clause 12 of section 2 of the Companies Act, 2013;
- ii. 'books of accounts' as defined in clause 13 of section 2 of the Companies Act, 2013;
- iii. 'documents' as defined in clause 36 of section 2 of the Companies Act, 2013;
- iv. 'registers' as defined in clause 74 of section 2 of the Companies Act, 2013

Further, the company may from time to time maintain above mentioned documents in electronic form to the extent possible.

3. DESTRUCTION OF DOCUMENTS AFTER THE SPECIFIED PRESERVATION TIME PERIOD

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both Physical and Electronic Document.

The documents as mentioned in Annexure- B, shall be destroyed after the relevant or prescribed period, by the department's heads in whose custody the documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the documents have been preserved.

A register of the Documents disposed/ destroyed 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 authorised person by the Board

4. RESPONSIBILITY

The Respective Department Heads of the Company shall be responsible for the maintenance and preservation of documents of its department in terms of this policy.

All the Employees on the permanent rolls of the Company are responsible for preservation of the documents in their work area and decision to retain/preserve or destroy documents pertaining to their area shall be taken only in consultation with their respective Department Head.

Department Head would yearly review the files and report the same to the Management Committee.

5. AMENDMENT

The Policy is flexible and easy to understand and comply with by all levels of employees. The Board may amend, modify or revise any or all clauses of this Policy in accordance with the applicable provisions of the Listing Regulations and amendment(s) thereto notified by the Securities and Exchange Board of India and/or Stock Exchanges, from time to time. However, amendments in the Listing Regulations shall be binding even if not incorporated in this Policy.

6. DISCLOSURE

Copy of this policy shall be placed on the website of the Company.

ANNEXURE -1

THE DOCUMENTS OF PERMANENT NATURE

S.No.	Nature of Document
01	All documents and Information originally filed with ROC for incorporation of Company
02	Memorandum of Association and Articles of Association as originally filed and updated from time to time
03	Register of Members
04	Index of Members
05	Minutes of General Meeting
06	Minutes of Board Meetings & Committee Meetings
07	Register of Charges
08	Register of Contracts in which Directors are interested
09	Register of Renewed & Duplicate Share Certificates
10	Register of loans, investments, guarantees and securities
11	Books and documents relating to the issue of share certificates, including the blank forms of share certificates, in case of disputed cases
12	Register of Investments not held by company in its own name
13	Register of shares or securities which have been bought back
14	Record of Private Placement Offers in PAS 5
15	Register of Director and Key Managerial Personnel
16	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

ANNEXURE -2**DOCUMENTS TO BE PRESERVED FOR NOT LESS THAT 8 YEARS AFTER COMPLETION OF RELEVANT TRANSACTIONS:**

S.No	Nature of Document(s)	Preservation Period (in years)
01	Books of Accounts and Financial Records together with its vouchers	8
02	Annual Return(s) along with annexures and certificates	8
03	Register of Debenture holders	8
04	Index of Debenture holders	8
05	Statutory Registers	8
06	Office copies of Notices, Agenda, Notes on Agenda and other related papers of Board and its Committee meeting	8
07	Office copies of Notices of Annual General Meeting, Scrutinizer's Report and related papers	8
08	The Register of Debenture Holders or any other security holders along with the index	8
09	Register of Deposits	8
10	Disclosure of interest by Directors	8
11	ROC Filings other than Incorporation and changes in any clause of the Memorandum and Articles of Association	8
12	Instrument creating a charge or modification thereon	8
13	Books and documents relating to the issue of share certificates, including the blank forms of share certificates	8
14	Attendance register	8
15	Relevant records as required under Code of Conduct for Prevention of Insider Trading	5
16	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.	