

KHANDWALA SECURITIES LIMITED

PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY

(Under Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015)

1. INTRODUCTION

The Board of Directors of Khandwala Securities Limited (the “Company”) has adopted the following policy with regard to preservation and archival of Documents. Regulation 9 of the Securities Exchange Board of India (“SEBI”) (Listing Obligation and Disclosure Requirements) Regulations, 2015 requires the Company to frame a policy on preservation of documents. Further, Regulation 30(8) requires the Company to frame a Policy on website disclosure and archival of such disclosures.

In compliance to the aforesaid regulation, this policy is formulated to define a process for preservation of documents and to further develop a guideline for archival of such documents including those which are maintained in the electronic form and are disclosed on the website of the Company. In other words, the Policy further encompasses the manner of archival of the documents which have been disclosed on the website of the Company for the timeframe prescribed in various Regulations

2. PURPOSE OF THE POLICY

The purpose of this policy is to establish the framework needed for effective preservation of documents and records of the Company required to be maintained under the Listing Regulations, in terms of Regulation 9 and also to archive any of the material of events or information which are disclosed by the Company to the Stock Exchanges prior to the period of five years in terms of Regulation 30.

3. POLICY FOR PRESERVATION OF DOCUMENTS

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 – I**)
- b. Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions the subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. (**Annexure – II**)

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

4. RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS:

All the Employees of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing the responsibility on the Company's employees would immensely help the Company's preparedness for handling any litigation, enabling the Company and the outside legal counsel to track down all required documents to handle the legal cases till their logical conclusion.

5. ARCHIVAL POLICY

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges 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.

6. REVIEW OF THE POLICY

The board of directors of the company shall review the policy on annual basis. The authorized person shall provide regular assurance to board of directors on the effectiveness of the Policy.

7. DISCLOSURE/AMENDMENT

This policy as amended from time to time shall be made available at the website of the Company. The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

Annexure - I

Documents whose preservation shall be permanent in nature:

Sr. No	Nature of Documents
1	All documents and Information originally filed with ROC for Incorporation of Company
2	Memorandum of Association and Articles of Association as originally filed and updated from time to time
3	Register of Members
4	Index of Members
5	Minutes of all the General Meeting, Board & Committee Meetings
6	Financial Statements, Financial Results Audited and Unaudited, duly signed annual reports.
7	Annual Return filed with ROC
8	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

Annexure - II

Documents with preservation period of not less than eight years after completion of the relevant transactions:

Sr. No	Nature of Documents
1	Books of Accounts
2	Annual Return(s)
3	Register of Debenture holders
4	Index of Debenture holders
5	Statutory Registers
6	Tax related records and documents
7	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time