



KUSHAL LIMITED
(Formerly known as Kushal Tradelink Limited)

POLICY ON PRESERVATION OF DOCUMENTS



I. Introduction:

This policy attempts to preserve and maintain documents of the organisation. During the course of business, the company generates several documents either in physical or in electronic mode. Most of the documents are useful for a short span of time and are kept for a definite period, but some documents may be required to be maintained permanently during the lifetime of the organisation. In order to preserve such documents, the company needs to implement a well-considered, well-documented plan to ensure that they remain in good condition over a period of time.

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), the Board of Directors (the "Board") of Company has adopted this Policy at its meeting held on 28th December, 2015, for Preservation of Documents, as required under applicable regulations.

This Policy is effective from 28th December, 2015.

In any circumstances, where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time as this Policy is changed to conform to the law, rules, regulation or standard.

II. Objective:

This policy sets the standards for managing, storing and preservation of documents of the company broadly classified in the following two categories:

- A. The documents of a permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the company.
- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in Annexure-2) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years. Provided further that the Company may keep the documents as specified above in an electronic mode.
- C. Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 and such shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.



III. Definitions:

1. **“Act”** means the Companies Act, 2013.
2. **“Authorised Person”** means any person duly authorised by the Board.
3. **“Board of Directors” or “Board”** means the Board of Directors of KUSHAL LIMITED, as constituted from time to time.
4. **“Company”** means KUSHAL LIMITED
5. **“Documents”** means recording of information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.
6. **“Document Keeping”** means making and maintaining complete and reliable data of business transactions in the form of recorded information.
7. **“Electronic Record(s)”** means the electronic record as defined under clause (t) of sub section (1) of section 2 of the Information Technology Act, 2000.
8. **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the company or otherwise the company has control over access to it.
9. **“Maintenance”** means keeping documents, either physically or in Electronic Form.
10. **“Policy”** means policy on Preservation of documents.
11. **“Preservation”** is maintenance of documents, files and documents in good order and to prevent from being altered, damaged or destroyed.
12. **“Listing Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

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



IV. Roles & Responsibilities

The respective Departmental Heads of the company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy

V. Classification of Documents

The preservation of Documents shall be done in the following manner:

- a) When the documents are required to be preserved as per applicable law, same shall be preserved in such manner.
- b) Where there is no such requirement, then for such period as mentioned in this policy.

VI. Custody of the Documents

The Board may authorise any person or such other persons as it may deem fit as the Authorised Person-

VII. Destruction of Records

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode as approved by the Board of Directors. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/ unimportant/ irrelevant.

This applies to both Physical and Electronic Documents.

VIII. Amendments to the Policy

The Board of Directors shall amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

IX. 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.



Annexure: 1

Documents whose preservation shall be permanent in nature as per Companies Act, 2013

S.no	Nature of Document(s)
1.	Certificates of Incorporation
2.	Memorandum and Article of Association (as amended from time to time)
3.	Licenses & Statutory Approvals
4.	Statutory Registers required under applicable laws
5.	Minute books of General Meeting and Board Meetings
6.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure: 2

Documents with preservation period of not less than eight years after completion of the relevant transactions as per Companies Act, 2013

S.no	Nature of Documents
1.	Attendance Registers
2.	Office copies of Notices, Agenda, Notes on Agenda to call Board Meeting (or Committee Meeting of the Company
3.	Annual Reports
4.	Annual Returns
5.	Income Tax Returns filed under Income Tax Act, 1961
6.	Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013
7.	Instruments creating or modifying Charges along with satisfaction of charge
8.	Tax Records- including but not limited to documents concerning tax assessment, tax filing, proof of deduction, tax returns, appeal preferred against claims made by the relevant tax authorities and other concerned documents
9.	Disclosures and/or Declarations as per Companies Act, 2013 and other applicable laws
10.	Legal documents
11.	Disclosures and/or Declarations under SEBI (Listing Obligation and Disclosure Requirement) Regulation 2015 and others