

POLICY FOR PRESERVATION OF DOCUMENTS

Purpose:

The purpose of this policy is to state the principles that guide the Company and its Officers on maintenance and preservation of documents, registers and records of Pudumjee Pulp & Paper Mills Limited.

Legal Framework:

Pursuant to regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, 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.

Effective Date:

This Policy is effective from 1st December, 2015.

Definitions:

- (i) "Act" means the Companies Act, 2013 and includes the applicable Rules and Regulations framed thereunder.
- (ii) "SEBI Act" means the Securities and Exchange Board of India Act, 1992 (15 of 1992) or any statutory modification or re-enactment thereof and includes any rules, regulations and guidelines framed thereunder.
- (iii) "Regulations" means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulation, 2015.
- (iv) "Board of Directors" or "Board" shall mean the Board of Directors of the Company.
- (v) "Company" means PUDUMJEE PULP & PAPER MILLS LIMITED.
- (vi) "Document" includes papers, notes, agreements, summons, notice, advertisements, requisitions, order, declaration, form, minutes, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of

the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

- (vii) “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.
- (viii) “Maintenance” means keeping registers and records, either physically or in electronic mode as may be permitted under any law for the time being in force and includes the making of appropriate entries therein, the authentication of such entries and the preservation of such registers and records.
- (ix) “Preservation” means to keep in good order; to prevent from being altered, damaged or destroyed.
- (x) “Record” means a documentary evidence of past events or transactions.
- (xi) “Register” means a register maintained, either physically or in electronic mode, under the Act or the SEBI Act and includes registers referred to in Secretarial Standards issued by the Institute of Company Secretaries of India.

Preservation of Records:

The preservation of records is based on the following two categories:

(a) The documents whose preservation shall be permanent in nature (listed in Annexure A) shall be maintained and preserved permanently by the Company subject to the modification, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modification, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

(b) The documents to be maintained and preserved period of not less than eight years after completion of the relevant transactions (listed in Annexure - B), subject to the modification, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modification, amendments, additions, deletions in the documents shall also be preserved for a term not less than eight years.

The Company will keep the documents as specified above in an electronic mode also.

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.

Destruction of Documents:

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s).

Destruction of documents as a normal administrative practice usually occurs because the records are duplicate, unimportant and irrelevant or for short term use only.

This applies to both Physical and Electronic Documents.

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 any of the Key Managerial Personnel or such other persons as may be authorized by the Board for the purpose (as per format listed in Annexure C).

Amendments:

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

Annexure A

Permanently Preservation

Sr. No.	Particulars of Register and Document(s)
1	Register of Members
2	Register of Debenture Holders/ Other Securities Holders
3	Register of Directors and Key Managerial Personnel and Their Shareholding
4	Register of Renewed and Duplicate Share Certificate
5	Register of Charges
6	Register of Loans, Guarantee, Security And Acquisition Made By Company
7	Register of investment not held in its own name by the company
8	Register of Contracts or Arrangement With Related Party In Which Directors Are Interested
9	Register of Documents Executed Under Common Seal
10	Register of Records And Documents Destroyed
11	Register of Transfer of Shares
12	Register of Transmission of Shares
13	Register in respect of SEBI(Substantial Acquisition of Shares And Takeovers) Regulations, 2011
14	Minutes Book of General Meeting
15	Minutes Book of Board Meeting
16	Minutes Book of Committee Meeting
17	The Memorandum and Articles of Association of the Company
18	Registration Certificates
19	Licenses & Statutory Approvals
20	Audited Financial Results
21	Any other record, document or register not included above which is required to be maintained under any Law in force shall be preserved for the period as may be prescribed under such Law.

Annexure B

Temporary Preservation

Sr. No.	Particulars of Register(s) and Document(s)
1	Register of deposits accepted/ renewed
2	Register of Allotment of Securities
3	Register of Payment of Dividend
4	Register of Directors' Attendance
5	Register of Postal Ballot (The Scrutinizer's report and office copies of the notices should be preserved in good order until the resolution has been implemented or for a period of 10 years, whichever is later.)
6	Register of Proxies
7	Register of Inspection
8	Register of Investors' Complaints
9	Register in respect of SEBI (Prohibition Of Insider Trading) Regulations, 2015
10	Books of Accounts
11	Annual Return
12	Catalogues
13	Personnel Documents
14	Correspondence with Departments/shareholders
15	Non - Statutory Register
16	Any other record, document or register not included above which is required to be maintained under any Law in force shall be preserved for the period as may be prescribed under such Law.

Annexure C

The Format of the Register of Documents disposed/destroyed

Sr. No.	Description of the records and documents destroyed	Name of authority authorising the destruction	Date of authorization of destruction	Date of destruction.