

**GODHA CABCON & INSULATION LIMITED**

**POLICY FOR PRESERVATION OF DOCUMENTS**

**I. Preamble**

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") came into force from December 1, 2015. In accordance with Regulation 9 of the SEBI LODR the Board of Directors of Godha Cabcon & Insulation Limited ("the Company") is required to frame a Policy for Preservation of Documents ("Policy") classifying them into two categories:

- i. Documents whose preservation shall be permanent in nature; and
- ii. Documents to be preserved for not less than eight years.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that all the documents, whether in physical or electronic mode, form an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval as well as authentication.

Accordingly, the Board of Directors of the Company on November 30, 2017 has adopted the Policy for Preservation of Documents. This Policy shall come into effect from the date of listing of Equity Shares of the Company on the stock exchange(s).

**II. Object and Scope**

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

**III. Definitions:**

- I. Act: Means the Companies Act, 2013.
- II. Board of Directors: Board of Directors of Godha Cabcon & Insulation Ltd.
- III. The Company: "GODHA CABCON & INSULATION LTD" or "the Company" or "GODHA".
- IV. SS-1: Secretarial Standard-1 for the Board Meetings as notified by the ICSI.
- V. SS-2: Secretarial Standard-2 for the General Meeting as notified by the ICSI.

- VI. SEBI (LOADR) Regulation, 2015: SEBI (Listing Obligations and Disclosures Requirements) Regulation, 2015.
- VII. Compliance Officer: The Company Secretary and/or a Key Managerial Person appointed by the Board of Directors of the Company as the Compliance Officer for the purpose of these regulations from time to time.
- VIII. SEBI: The Securities and Exchange Board of India.
- IX. Rules: Rules made under the Companies Act, 2013. X. Regulation: Regulation made under SEBI Act
- X. Regulation: Regulation made under SEBI Act

**IV. Documents Whose Preservation Shall Be Permanent In Nature:**

The Board of Directors shall decide necessity of preservation of documents permanently from time to time as required under the act and regulations.

- A. Financial Statements, duly signed annual reports.
- B. Annual Returns filed with the ROC.
- C. Minutes of all the General Meetings, Board & Committee Meetings.
- D. Disclosures made under the SEBI Insider and Takeover Regulations and the SEBI (LOADR) Regulations, 2015 to the Stock Exchange from time to time.
- E. Memorandum and Articles of Association of the Company as may be amended from time to time.
- F. Shareholders and Joint Venture agreement.
- G. Letter of Offer related to public issue, right issue, further issue, buyback offer, etc.
- H. Agreement with the Share Transfer Agent, Depositories.
- I. Any others, if Board of Directors may think deemed fit.

**V. Documents with preservation period of not less than eight years for completion of the relevant transaction:**

- A. Notice of the Board meetings given to the Stock Exchange for considering matters relating to pre intimations required to be submitted to the Stock Exchange.
- B. Date for the Book Closures and Record dates for various purposes as may be decided by the Company from time to time.
- C. Quarterly and half yearly and annual financial results of the Company.
- D. Quarterly and half yearly Shareholding Pattern including details for pledge of shares and any changes therein.
- E. Results of the E-Voting, General Meetings, Postal Ballot etc.
- F. List of Unpaid Dividend to the shareholders.
- G. Change in the constitution of the Board of directors, KMP, Compliance Officer, Auditors, Secretarial Auditors, Share Transfer Agent.

- H. Any Price Sensitive information given or provided to the Stock Exchange under Regulation 30 of the SEBI (LOADR) Regulations, 2015.
- I. Recommendation and payment of dividend to the shareholders
- J. Details of the Complaints received and resolved by the Company.
- K. Corporate Governance Report submitted to the Stock Exchange on quarterly and annual basis.
- L. Copy of the orders issued by the SEBI or Stock Exchanges relating to securities listed with the Stock Exchanges.
- M. Disclosures made under companies Act, in form MBP-1.
- N. Registers maintained under the Companies Act.
- O. TAX Records

**VI. Responsibility of employees for preservation of documents:**

The Company Secretary and in absence thereof the Key Managerial Personal appointed by the Board of directors 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.

**VII. Authorized for monitoring the policy:**

The Company Secretary or any one Key Managerial Personnel of the Company authorized by Board of Directors shall be responsible for monitoring the Policy. The authorized person shall inform its Board of Directors about the monitoring of the Policy. The authorized person shall take necessary steps to discharge his duty.

**VIII. Security of documents:**

The Board shall ensure that all the documents shall be kept in a safe place in the Company premises. The Board may authorize person(s) for the security of documents, who shall be responsible for safe custody of documents.

**IX. Disposal of documents:**

Disposal of documents after said period of eight years (whose preservation shall not be permanent in nature) shall be done in the presence of Authorized person in method prescribed by Board of Directors. Before disposing a soft copy shall be taken for the record.

**X. 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.