

AVSL INDUSTRIES LIMITED

POLICY FOR PRESERVATION
OF DOCUMENT & ARCHIVAL
POLICY

**Under Regulation 9 of the SEBI (Listing
Obligations and Disclosure Requirements)
Regulation, 2015**

POLICY FOR PRESERVATION OF DOCUMENT & ARCHIVAL POLICY

Under Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015

1. PREAMBLE

The Board of Directors (Board) of AVSL Industries Limited (“the Company” or “AVSL”) has adopted the following policy and procedure with regard to preservation of documents as defined below. The Board shall review and may amend this policy from time to time.

2. PURPOSE:

This policy is framed as per requirement of Regulation 9 of SEBI (Listing Obligations and Disclosures Requirements) Regulation, 2015

3. REGULATORY

In terms of Regulation 9 of LODR, the Company is required to formulate a policy for preservation of documents required to be maintained under the LODR in at least two categories as specified in the said Regulation.

Further, in terms of Regulation 30(8) of the Regulations, the Company is required to formulate an archival policy for all disclosures of events/information to the Stock Exchanges in terms of the Company’s Policy for Disclosure of Events/Information and Determining of Materiality.

4. DEFINITIONS

- a. **Act:** Means the Companies Act, 2013
- b. **Board:** means the Board of Directors of “AVSL INDUSTRIES LIMITED”.
- c. **The Company:** Means “ AVSL Industries Limited
- d. **SS-1:** Means Secretarial Standard-1 for the Board Meeting as notified by the ICSI
- e. **SS-2:** Means Secretarial Standard-2 for the General Meeting as notified by the ICSI

- f. **SEBI (LODR) Regulation, 2015:** Means SEBI (Listing Obligations and Disclosures Requirements) Regulation, 2015
- g. **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.
- h. **“Policy”** means this Policy, as amended from time to time.
- i. **Rules:** Rules made under the Companies Act, 2013.
- j. **Regulation:** Regulation made under SEBI Act.

5. PRESERVATION OF DOCUMENTS

1. 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;
 - b) Other Documents shall be preserved for a period of not less than eight (8) years after Completion of the relevant transactions.
2. The listing documents and records in physical form shall be in the custody of the Company Secretary.
3. The Company may keep the listing documents and records as specified above in electronic mode.

6. 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 Regulation.

Notwithstanding anything contained herein the Act, SS-1 and SS-2 the following documents/ Records maintained under the Act, Rules and Regulations shall be preserved permanently and Hosted on the website of the Company: -

- 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, buy back offer, etc.
- h. Any others, if Board of Directors may think deemed fit.
- i. Agreement with the Share Transfer Agent, Depositories.

7. 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.

8. 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 step to discharge his duty.

9. PRESERVATION PRINCIPLES:

It is only through preservation that continued availability and access to items in the collections can be maintained. The following principles shall be kept in mind: -

- Where possible, documents are preserved in their original format, respecting the physical integrity and authenticity of the original documents.
- All staff are made aware of the paramount importance of preservation, and are trained on safe handling of documents.

10. SECURITY OF DOCUMENTS:

The Board shall ensure that all the documents shall keep in safe place in the Company premises.

The Board may authorize person for the security of documents, who shall be responsible for safe custody of documents.

12. DISPOSAL OF DOCUMENTS:

Disposal of documents after said period of 8 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.

13. 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.

14. OBJECTIVE

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately preserved, protected and if required, destroyed as per the statutory requirements after following the due process. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements. This Policy is framed in accordance with the requirement under Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (including any amendments thereof). The Company is required to disclose the policy on its website.