

# PEARL ELECTRONICS LIMITED

To ensure safe-keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents.

## POLICY ON PRESERVATION OF THE DOCUMENTS

This document supersedes any Policy on preservation of the Documents in the Company, and should be read in conjunction with the most recent policies/code and procedures documented and held on file.



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## 1. PREAMBLE AND SCOPE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations) and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as “SEBI (LODR) Regulations” or Regulations”] requires every listed Company to have a policy on Preservation of Documents/records maintained by the Company either in Physical Mode or Electronic Mode.

A policy on preservation of Documents (defined below) would ensure safe-keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the SEBI (LODR) Regulations, on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

## 2. DEFINITIONS

2.1 “**Act**” means the Companies Act, 2013.

2.2 “**Applicable Law**” means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

2.3 “**Authorized Person**” means any person duly authorized by the Board.

2.4 “**Board**” means the Board of directors of the Company or its Committee.

2.5 “**Company**” means **PEARL ELECTRONICS LIMITED**.

2.6 “**Current**” means running matter or whatever is at present in course of passage.

2.7 “**Document(s)**” refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, 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.

2.8 “**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.

2.9 “**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.

2.10 “**Maintenance**” means keeping Documents, either physically or in Electronic Form.

**2.11 “Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

**2.12 “Regulations”** means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

### 3. **OBJECTIVES OF THE POLICY**

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for discarding the same.

**The major objectives of the policy are:**

- To identify statutory registers and other records of the Company which are required to be preserved;
- To identify and categorize the Statutory Registers and Records to be maintained either for a period of eight years or permanently.
- To decide the mode of preserving the documents, whether in physical form or in electronic form;
- To decide after completion of 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per the guidelines of the Policy or as decided by the Board of Directors at that time.;
- To aid employees of the Company in understanding their obligations in retaining and preserving the documents and records

### 4. **INTERPRETATION**

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and / or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

### 5. **GUIDELINES**

Regulation 9 of SEBI (LODR) Regulations provides that the Company 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.

Accordingly, the Company has classified the preservation of documents to be done in the following manner:

- a) Documents that needs to be preserved and retained permanently;
- b) Documents that needs to be preserved and retained for a period of 8 years as specified under the Act or Regulation;
- c) Documents that needs to be preserved and retained for such period as applicable to the company;
- d) Where there is no such requirements as per applicable laws, then for such period as the documents pertains to a matter which is “Current”

An indicative list of the Documents and the time-frame of their preservation is provided in “**Annexure- I**”.

## 6. **MODES OF PRESERVATION**

The Documents may be preserved in:-

- 6.1 Physical Form; or
- 6.2 Electronic Form.

The officer of the Company required to preserve the Document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per Applicable Law.

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

The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

## 7. **CUSTODY OF THE DOCUMENTS**

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

## 8. **DESTRUCTION OF DOCUMENTS**

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure- I** may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under **Annexure- I**. The details of the documents destroyed by the company shall be recorded in the Register for disposal of records to be kept by employee s who are isposing of the documents in the format prescribed at **Annexure- II**. The entries in the register shall be authenticated by the authorized person.

## **9. POLICY REVIEW**

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

## **10. MODIFICATION OF POLICY**

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.

## ANNEXURE – I

### INDICATIVE LIST

PERMANENT PRESERVATION	TEMPORARY PRESERVATION
<ul style="list-style-type: none"> <li>• Common Seal</li> <li>• Minutes books of Board, General Meetings and Committee Meetings,</li> <li>• Statutory Registers,</li> <li>• License and Permissions,</li> <li>• Statutory Forms and disclosures except for routine compliance,</li> <li>• Scrutinizers’ Report</li> <li>• Register of Members and</li> <li>• Index of Members.</li> </ul>	<ul style="list-style-type: none"> <li>• Annual Returns,</li> <li>• Board Agenda and supporting documents,</li> <li>• Attendance Register,</li> <li>• Office copies of Notice of General Meeting and related papers</li> <li>• Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers,</li> <li>• All notices pertaining to disclosure of interest of directors,</li> <li>• Instrument creating a charge or modification,</li> <li>• Books of accounts, financial statements etc. and</li> <li>• Register of debenture holders or any other security holders.</li> </ul>
<b>OTHERS</b>	
<ul style="list-style-type: none"> <li>• As per applicable law.</li> </ul>	

## Annexure- II

### THE FORMAT OF THE REGISTER OF DOCUMENTS DISPOSED/DESTROYED

PARTICULARS OF DOCUMENTS ALONGWITH PROVISION OF APPLICABLE LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF AUTHORISED