# PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY OF THE HI-TECH GEARS LIMITED

# **PREAMBLE**

Pursuant to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015 ("Listing Regulations") the Board of Directors of The Hi-Tech Gears Limited has established a "Preservation of Documents" Policy, at its meeting held on November 3 2015, which would ensure safe keeping of the records and safeguard the Documents from getting manhandled. This policy is formulated to aid the employees in handling the Documents efficiently.

The policy is Effective from December 1, 2015.

Additionally, In terms of Regulation 30(8) of the Listing 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.

# **DEFINITIONS**

- "Act" shall mean the Companies Act, 2013, and rules made there under, as amended from time to time.
- "Board" shall mean the Board of Directors of the Company, as may be re-constituted from time to time
- "Company" shall mean "The Hi-Tech Gears Limited."
- "Document(s)" refers to all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

- "Preservation" shall mean to keep in good order and to prevent from being altered, damaged or destroyed.
- "Key Managerial Personnel" "Key Managerial Personnel" shall mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.
- "Regulations" shall mean the Securities Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulations, 2015.
- "Secretarial Standards" means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.
- "Policy" shall mean, "Preservation of Documents and Archival policy".

The words and phrases used in this policy and not defined here shall derive their meaning from the Companies Act, 2013 & other Applicable Laws.

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.

# POLICY FOR PRESERVATION OF DOCUMENTS

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 change 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 all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

# **ARCHIVAL POLICY**

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 2 years.

# **CUSTODY OF THE DOCUMENTS**

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

### AUTHORITY TO MAKE ALTERATIONS TO THE POLICY

This policy as amended from time to time shall be made available at the website of the Company. The right to interpret/amend/modify this Policy vests in the Board of Directors of the Company.

#### 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 will also be followed for records which are duplicate/ unimportant/ irrelevant.

This applies to both Physical and Electronic Documents.

# COMMUNICATION OF THE POLICY

For all new employees, a copy of this policy be provided as a part of the joining Documentation through emails or through information of having it available on the Company Website. Similarly for existing Employees and Directors a copy of this policy shall be posted on the web-site of the Company.

#### REVIEW OF THE POLICY

The Policy shall be subject to review & amendment by the Board as may be deemed necessary and in accordance with any regulatory amendments.

# **SCOPE AND LIMITATION**

In the event of any conflict between the provisions of this Policy and the SEBI's LODR Regulations, 2015/ Companies Act, 2013 or any other statutory enactments, rules, the provisions of such Listing Regulations / Companies Act, 2013 or statutory enactments, ('Regulations') those regulations shall prevail over this Policy.

# **DISCLOSURE**

This policy shall be disclosed on the company's website www.thehitechgears.com and a weblink thereto shall be provided in the Annual Report of the Company.

# Annexure 1 THE HI-TECH GEARS LIMITED

Documents whose preservation shall be permanent in nature

S.NO	Nature of document(s)
01	Registration Certificates
02	Licenses & Statutory Approvals
03	Statutory Registers required under applicable laws
04	Audited financial statements
05	Minutes of General Meeting
06	Minutes of Board Meeting
07	Minutes of various Committee Meetings
08	Material Agreements/ Contracts
09	Orders issued by Courts/ Statutory bodies
10	Investments Documents/ proofs including certificates etc.
11	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 THE HI-TECH GEARS LIMITED

Documents with preservation period of not less than eight years after completion of the relevant transactions

S. No	Nature of Document(s)
01	Books of Accounts, Financial Statements etc.
02	Annual Return files in accordance with the Provisions of Companies Act, 2013
03	Personnel Documents
04	Office copies of Notice of General Meeting/ Board Meeting / Committee Meeting, Notes on Agenda and other related papers,
05	Instrument creating a charge or modification
06	All notices pertaining to disclosure of interest of directors/KMP
07	Compliance Report received from various Authorities.
08	Forms filed with MCA and other Authorities.
09	Correspondence made with Departments/ shareholders
10	Non-Statutory Registers/ Documents
11	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

Incorporated on: 3<sup>rd</sup> November, 2015