

POLICY FOR PRESERVATION OF DOCUMENTS

[Pursuant to Regulation (9) of Securities Exchange Board of India Listing Obligations and Disclosure Requirements) Regulations, 2015]



1. PREFACE

This Policy for "Preservation of Documents" will be known as "ADOR FONTECH LIMITED's Policy for Preservation of Documents ", and is hereinafter referred to as 'Policy'.

This Policy is prepared in accordance with the applicable provision/s of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

This Policy is to be read along with ADOR FONTECH LIMITED's Archival Policy.

This Policy will be effective from 01st December, 2015.

2. OBJECTIVE OF THE POLICY

2.1 To outline the guidelines citing the duration of certain documents to be preserved in good order and to prevent them from being damaged or destroyed.

2.2. To ensure systematic retention of records, so as to reasonably safeguard them from loss, alteration, or destruction and facilitate access to documents received or created in the course of business.

3. DOCUMENT CLASSIFICATION

The documents and records, both physical and electronic, are classified under the following types:

3.1 Documents to be preserved permanently

3.2 Documents with preservation period of not less than eight years after / upon / from completion of the relevant transactions.

3.3 Documents to be preserved for any other duration

4. DURATION OF PRESERVATION OF DOCUMENTS

4.1 The inventory of documents / records to be preserved permanently is attached to this Policy as Annexure A.

4.2 The inventory of documents / records to be preserved for not less than eight years from the date of relevant transaction is attached to this Policy as Annexure B.

4.3 The inventory of documents / records to be preserved for any other period is attached to this Policy as Annexure C.

The attached Annexures A, B & C indicate an illustrative (not exhaustive) list of record retention of the Company, which is inclusive of physical and electronic documents / records.

5. ADMINISTRATION OF THE POLICY

5.1 The Compliance Officer shall be overall in-charge of the administration of this policy and he has to ensure that the record retention schedule is followed across the Company.

5.2 The Head-Operations through respective Functional Heads shall be responsible for maintaining necessary records and documents within / at their respective units, or designated places, if any, as may be required under the applicable statutes from time to time.

6. REVIEW AND CHANGES TO THIS POLICY

- 6.1 The Board will review this Policy annually or as often as it considers necessary;
- 6.2 The Board will change this Policy, if required by law, from time to time.
- 6.3 If the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over these policies and procedures, until such time this policy is changed / revised to conform to the law, rule, regulation or standard.

7. APPROVED AND ADOPTED

This policy was approved & adopted by the Board of Directors on Friday, October 30, 2015.

For Ador Fontech Limited

A T Malkani
Chairman

H P Ledwani
Managing Director

Annexure - A

DOCUMENTS TO BE PRESERVED PERMANENTLY

1. Memorandum of Association & Articles of Association
2. Register and index of Members
3. Register of Transfer of Shares
4. Register of Transmission of Shares
5. Register of Renewed & Duplicate Share Certificates
6. Register of Charges
7. Register of Contracts in which Directors are interested
8. Register of Directors & Key Managerial Personnel
9. Register of Directors' Shareholding
10. Register of Inter-Corporate Loan, Investment and Guarantee
11. Register of investments in securities not held in the name of the Company
12. Register of Debenture holders
13. Register of transfer of Debentures
14. Register of Transmission of Debentures
15. Register of documents executed under common seal
16. Register of records and documents destroyed
17. Minutes of General meetings, Board Meetings and Committee Meetings
18. Record of Employee Stock Purchase Scheme
19. Policies formulated under various laws, if any
20. Records under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 1997 and SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
21. Forms and returns filed with the Registrar of Companies / Ministry of Corporate Affairs
22. Certificates issued by the Registrar of Companies
23. Any court order / CLB order
24. Annual Reports
25. Any other document, as may be decided by the Management or required by Statute.

Annexure - B**DOCUMENTS TO BE PRESERVED FOR A PERIOD OF AT LEAST UPTO 8 YEARS**

1. Register of Buy-back of securities, from the date of completion of buy-back
2. Register of Deposits, from the date of last entry
3. Register of Allotment, from the date of each allotment
4. Register of Dividend, from the date of payment
5. Register of Directors' attendance
6. Register of Proxies, from the date of meeting
7. Register of Inspection from the date of last inspection
8. Register of Investor Complaints, from date of last entry
9. Records of issued and cancelled Share / Debenture certificates
10. Register of Sweat equity shares, from the financial year in which the latest entry is made
11. Books of accounts, together with vouchers, records and papers relevant to any entry in the books for a period of 8 accounting years immediately preceding the current accounting year
12. Annual Return – Last 8 annual returns
13. Any other document, as may be decided by the Management or required by Statute.

Annexure - C**DOCUMENTS TO BE PRESERVED FOR ANY OTHER DURATION**

1. Register and index of debenture holders and Other Security holders - 15 years from date of redemption of Debenture and other Security.
2. Register of foreign members or debenture holders to be maintained until discontinued
3. Postal Ballot – Until the resolution has been implemented or for a period of 10 years, whichever is later
4. Employee Stock options – 15 years from the date of exercise of options
5. Declarations under SEBI (Prohibition of Insider Trading) Regulations, 1992 and SEBI (Prohibition of Insider Trading) Regulations, 2015 - 5 years
6. Investors' correspondence – 5 years
7. Replies to show cause notices, if any, - 2 years
8. Any other document, as may be decided by the Management or required by Statute.