

ABN INTERCORP LIMITED

POLICY ON PRESERVATION OF DOCUMENTS **UNDER REGULATION 9 OF SEBI (LISTING OBLIGATIONS** **AND DISCLOSURES REQUIREMENTS) REGULATION, 2015**

Preface:

The Securities and Exchange Board of India (SEBI) has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations, 2015") which shall be applicable to all listed entity with effect from 1st December, 2015. The Listing Regulations, 2015 shall replace the existing Listing Agreements entered into by the Company with the Stock Exchanges.

Regulation 9 of Listing Regulations, 2015 is reproduced as under:

Preservation of Documents

The listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them on 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:

Provided that the listed entity may keep documents specified in clause (a) and (b) in electronic mode.

The Board of Directors (the "Board") of ABN Intercorp Limited (the "Company") has approved this policy for preservation and disposal of documents/records maintained by the Company either in physical Mode or electronic mode (hereinafter referred to as "the Documents").

1. Purpose of the Policy

The purpose of this policy is to identify the documents to be preserved, mode of preservation, time for which the documents are to be preserved and ensure that all the statutory documents are preserved in compliance with the Relevant Laws.

2. Applicability of the Policy

This Policy shall be applicable to the Company with effect from **1stDecember, 2015**.

3. Classification:

The preservation of Documents shall be done in the following manner:

- (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.

An indicative list of the Documents and the timeframe of their preservation is provided in **Annexure I**.

4. Mode of Preservation:

The Documents may be preserved in

- a. physical form or
- b. Electronic Form.

The Authorized Person is expected to observe the compliance of requirements of 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.

5. Custody of the Documents

Subject to the Applicable Law, the custody of the Documents shall be with the Authorized Person. Where the Authorized 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 authorize such other person as it may deem fit as the Authorized Person

6. Authority for Approval of Policy

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted via the Regulations.

7. Disposal of Documents:

The documents shall be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the documents are stored, after the prior specific approval of the Managing Director or Whole Time Director of the Company or any other person authorized by the Board of Directors from time to time and as per Applicable

Law pursuant to which the documents have been preserved. The details of the documents destroyed by the company shall be recorded in the Register of Disposal of Records to be kept by Employees who are disposing of the document in the format prescribed in **Annexure II**

8. Disclosures

The Company shall disclose the Policy on its website.

9. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

Details of Amendments to the Policy

Sr. No.	Policy Change Effective Date	Clause No.	Particulars of Change	Date of Board Meeting in which changes Approved

Annexure – I**Indicative list**

SR. NO		PARTICULAR
A		PERMANENT PRESERVATION
	a)	The Memorandum and Articles of Association of Company
	b)	Certificate of Incorporation and subsequently amended certificates
	c)	Minutes books of Board, General Meetings and Committee Meetings
	d)	Statutory Registers
	e)	License and Permissions
	f)	Statutory Forms and disclosures except for routine compliance
	g)	Scrutinizers' Reports
	h)	Policies and codes of the Company
B		PRESERVATION FOR MINIMUM 8 YEARS:
	a)	Annual Returns
	b)	Annual Reports
	c)	Notice, Agenda papers and supporting documents of Board/Committee Meetings
	d)	Notice, Agenda papers and supporting documents of General Meetings
	e)	Attendance Registers
	f)	Circular Resolutions
	g)	All notices pertaining to disclosure of interest of directors
	h)	Books of accounts, financial statements etc.
	i)	Non Mandatory Registers
C		OTHERS:
		As per applicable law

Annexure - II

Register of Disposal of Records

Sr. No.	Particulars of documents destroyed	Date and mode of destruction	Initials of the Authorized Person in whose presence the document is destroyed
