



## **POLICY FOR PRESERVATION OF DOCUMENTS**

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

### **Preamble:**

The Board of Directors (“Board”) of the B&B Triplewall Containers Limited (“the Company”) have adopted a policy and procedure with regard to preservation of documents as defined below. In any circumstances, where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time as this Policy is changed to conform to the law, rule, regulation or standard.

### **Purpose:**

This policy is framed as per the requirement of Regulation 9 of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements), 2015 (herein after referred to as “SEBI (LODR) Regulations” that requires every listed Company to have a policy on preservation of documents / records either in physical mode or electronic mode.

### **Objective:**

The Corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per this Policy. This Policy mechanism provides the comprehensive framework for preservation of documents for a specified period of time to achieve the following objectives:

- a) Effective corporate governance and risk management;
- b) Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- c) Systematic disposal/destruction of Company’s non-current records that have outlived their administrative usefulness.
- d) Identification of the Company’s records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company’s Archives.

**Definitions:**

- I. **“Company”** means B&B Triplewall Containers Limited
- II. **“Act”** means the Companies Act, 2013.
- III. **“Applicable Law”** means any laws, rules, circular, guidelines or standard issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India Which have prescribed the preservation of the Documents.
- IV. **“Authorised Person”** means any person duly authorised by the Board.
- V. **“Board of Directors”** or **“Board”** means the Board of Directors of B&B Triplewall Containers Limited, as constituted from time to time.
- VI. **“Compliance Officer”** means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
- VII. **“Documents”** means recording of information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.
- VIII. **“Document Keeping”** means making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.
- IX. **“Electronic Record(s)”** means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- X. **“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.
- XI. **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- XII. **“Policy”** means policy on Preservation of documents.
- XIII. **“Preservation”** is maintenance of documents, files and documents in usable form.



XIV. “**Key Managerial Personnel**” or “**KMP**” shall have the same meaning ascribed to it under the Act.

XV. “**Listing Regulations**” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

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.

### **Scope of Policy:**

For the purpose of achieving the above objectives, the documents covered as per this policy have been divided into two sections,

- a) the records or the documents that will be preserved permanently by the Company.
- b) the records or the documents that will be preserved for the period of at least 8 years and not permanently.

This Policy applies to the records maintained by the Company in any format or medium. The records which are not required to be retained permanently shall be disposed-off according to this Policy.

### **Classification of documents:**

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

a) **Documents whose preservation shall be permanent in nature**

- Certificate of Incorporation.
- Memorandum and Article of Association.
- Minutes book of General Meetings, Board and Committee Meetings as per Companies Act, 2013.
- License and permissions.
- Register of members.
- Agreement made by the Company with Stock Exchanges, Depositories, Share transfer agent etc.
- Financial Statements, duly signed annual report.
- Annual return filled with ROC.
- Shareholders and joint venture agreement.
- Any other, if the Board may think deemed fit.

b) **Documents with preservation period of not less than 8 years after completion of the relevant transaction:**



- Instrument relating to creation / modification / satisfaction of Charge as per Companies Act, 2013
- Register of Inter Corporate Loans and Investments as per Companies Act, 2013.
- Register of Deposits as per Companies Act, 2013
- Income Tax Returns filed under Income Tax Act, 1961.
- Copy of newspaper advertisement or publications.
- All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto.
- Corporate Governance Report submitted to the Stock Exchange on quarterly and annual basis
- Change in the constitution of the Board of directors, KMP, Compliance Officer, Auditors, Secretarial Auditors, Share Transfer Agent.
- Result of the E- voting, General Meetings, Postal ballot etc.

### **Responsibility of Employees for preservation of documents:**

The Compliance officer and in absence thereof the Key Managerial Personal appointed by the Board of Directors of the Company shall be responsible for the preservation of the records according to the time frame prescribed in the Policy for their preservation.

### **Location of Records:**

As mandated by the Companies Act, 2013 or under any other statute, certain records shall be located at the registered office of the Company. The records for which no specific place has been specified under any statute shall be maintained at the corporate office of the Company or at any other place as may be approved by the Board, from time to time.

### **Conversion into Electronic Form:**

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

### **Disposal of Documents:**

Disposal of documents after said period of eight 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.



**Amendments to the Policy:**

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

**General:**

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

**NOTE:** This Policy has been approved by the Board of Director in a Board Meeting held on August 03<sup>rd</sup>, 2018 and this policy will be applicable when Shares of the Company gets listed.

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