



POLICY FOR PRESERVATION OF DOCUMENTS

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

Document Title	Policy For Preservation of Documents
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PREAMBLE:

B&B Triplewall Containers Limited (**"the Company"**) recognizes the importance of preservation of documents & records and considers it as one of the fundamental tool for an organization to conduct its business operations effectively.

In accordance with the provisions of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, hereinafter referred as **"Listing Regulations"** all listed Companies are required to formulate a Policy for Preservation of Documents/records maintained by the Company either in Physical Mode or Electronic Mode.

This policy ensures that the Company maintains essential records and documents as per regulatory requirements, aiding in compliance, corporate governance, and operational efficiency.

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. **"Act"** means the Companies Act, 2013.
- II. **"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.
- III. **"Authorised Person"** means any person duly authorised by the Board.

- IV. **“Board of Directors”** or **“Board”** means the Board of Directors of B&B Triplewall Containers Limited, as constituted from time to time.
- V. **“Company”** means B&B Triplewall Containers Limited.
- VI. **“Documents”** shall mean all papers, records, files, books of account, summons, notice, license, requisition, order, declaration, confirmation, evidentiary record, tapes, CDs, DVDs, electronic record, electronic mail, instrument, statements, agreements, deeds, permissions, press release, returns, official publication, report, policies, record, form, register, voucher, minute book, storage devices etc., whether issued, sent or kept in pursuance of the Act or under any law or regulation for the time being in force or otherwise, maintained on paper or in electronic mode.
- VII. **“Document Keeping”** means making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.
- VIII. **“Electronic Record(s)”** means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- IX. **“Listing Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- X. **“Maintenance”** means keeping Documents, either Physically or in Electronic Form.
- XI. **“Policy”** means policy on Preservation of Documents.
- XII. **“Preservation”** "Preservation" is the means by which documents / records are protected for the present or future use. The objective of preservation is to minimize the risk of loss of records and slowing down, as much as possible, the process of physical deterioration which affect most archive materials.
- XIII. **“Register”** means a register maintained under the Companies Act, 2013 or the SEBI Act.
- XIV. **“Retention Period”** The time period during which a document must be retained before it is archived or destroyed.

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, or any other applicable law or regulations.

SCOPE OF THE POLICY:

Regulation 9 of Listing Regulations, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows –

- ❖ Documents whose preservation shall be permanent in nature;
- ❖ Documents with preservation period of not less than eight years after completion of the relevant transactions.

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 that need to be preserved and retained permanently

- Certificate of Incorporation and Certificate of Commencement of Business.
- Memorandum of Association (MOA) and Articles of Association (AOA).
- Licenses & Statutory Approvals.
- Minutes book of General Meetings, Board Meetings and Committee Meetings.
- Statutory Registers.
- Register of Members.
- Material Agreements / Contracts.
- Copyrights, Trademarks, industrial designs and Patents etc. owned by Company.
- Financial Statements of the Company.
- Annual Reports of the Company.
- Annual return filled with ROC.
- Agreement made by the Company with Stock Exchanges, Depositories, Share transfer agent etc.
- Order of Court/Tribunal/CLB/NCLT/Other Statutory Authority.
- Any other documents which are required to be preserved permanently in accordance of applicable law(s), Act, rules or regulations, guidelines, circulars and notifications etc. as may be applicable to the Company from time to time.

b) Documents that need to be preserved and retained for a period of 8 years after completion of the relevant transaction(s):

- Books of Accounts.
- Instrument relating to creation / modification / satisfaction of Charge as per Companies Act, 2013.

- Attendance registers, notices, agenda and notes to agenda of general meetings, board meetings and committee meetings and scrutinizer's report of general meetings.
- Documents relating to Postal Ballots.
- Result of the E- voting, General Meetings, Postal ballot etc.
- Disclosure / Declarations received from the Directors and KMPs.
- Employment/ Personnel Documents.
- Forms (including e-forms), documents including agreements, receipts, undertakings, affidavits with the Registrar of Companies, Regional Director, Ministry of Corporate Affairs, Government of India, Central government and/or any other Statutory Authority(ies).
- Statutory Filings with Stock Exchanges (NSE/BSE).
- Income Tax Returns filed under Income Tax Act, 1961.
- Copy of newspaper advertisement or publications.
- Change in the constitution of the Board of Directors, KMP, Compliance Officer, Auditors, Secretarial Auditors, Share Transfer Agent.
- All other documents which are required to be preserved for not less than 8 years in accordance with the provisions of applicable Act, rules, regulations, guidelines, circulars, and notifications etc. as may be applicable to the Company from time to time.

c) Other Documents & Records:

All other documents & records not mentioned above shall be preserved in accordance with the provisions of applicable Act, rules, regulations, guidelines, circulars and notifications etc. and where no time period is prescribed, shall be preserved for a minimum period of 8 (eight) years.

DISPOSAL OF DOCUMENTS:

After expiry of minimum period as mentioned in this Policy, the documents may disposed-off by the respective function/department in the presence of Authorized person as per the method prescribed by Board of Directors. Before disposing off any document, a soft copy shall be taken for the record.

RESPONSIBILITY:

The Head of respective departments of the Company shall be responsible for implementation of this Policy and shall also ensure that the employees understand the Policy and perform the processes and procedures to execute this policy.

Each department head shall act under this Policy in consultation with the Company Secretary and shall perform all acts and extend all cooperation to the Company Secretary to enable him to ensure compliance with the Policy and the Regulations.



PLACE OF PRESERVATION:

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.

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.

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.
