

ATLAS CYCLES (HARYANA) LIMITED

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Policy For Preservation Of Documents

1. SCOPE

In compliance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, this Policy for Preservation of Documents provides framework for preservation of documents of the Company. This Policy aims to ensure preservation of documents of the Company Law Department, Finance and Accounts Departments of Company (the “Departments”) at all Units of the Company in compliance with statutory and regulatory provisions as applicable.

2. PERIOD OF PRESERVATION

Documents of the Company shall be classified in the following categories for determining the period of preservation:

- a) Documents which shall be preserved permanently.
- b) Documents with the preservation period as defined under the applicable statutory / regulatory provisions.

3. COVERAGE OF DOCUMENTS

This Policy shall apply to documents maintained by the Company Law Department, Finance and Accounts Departments across all units of the Company including but not limited to documents maintained under the Companies Act, 2013 and rules made there under, Listing Agreement and other regulations / guidelines notified by the Securities and Exchange Board India, as amended from time to time.

4. IDENTIFICATION OF DOCUMENTS

Pursuant to this Policy, the Departments of the Company shall review the documents maintained by them for determining the period of preservation. While determining the period of preservation of documents, the Departments shall ensure due compliance with the laws and regulations applicable to the Departments.

The Departments shall also annually review the documents maintained at the end of each financial year for addition / deletion of documents.

The Departments shall submit a list of documents to be preserved alongwith the preservation period duly signed by the Head of the Department to the Whole Time Director or the Company Secretary of the Company within a period of 3 months from the end of each financial year. It is the duty of Company Law Department to send a written communication to all concerned Head of Departments in the month of April of each financial year to remind them to review the documents maintained by them and submit a report.

A consolidated list shall be prepared by the Company Law Department of the Company on the basis of lists submitted by the Departments, which shall form part of this Policy. An indicative list of documents of the Company Law Department along with the preservation period is given at Annexure-I to the Policy.

5. MAINTAINING RECORDS OF DOCUMENTS

a) Documents shall be maintained and preserved properly and stored in chronological order or in any other logical manner by the Departments to facilitate easy identification and retrieval.

b) Documents shall be properly dated so that their preservation period can be identified easily.

c) Documents shall be stored in such a way that their confidentiality can be maintained.

d) The Departments shall actively consider maintenance and preservation of their documents in electronic form unless maintenance and preservation of documents in physical form is a statutory requirement.

e) On completion of the Preservation Period, records may be destroyed at the instruction of the Head of the Department after obtaining approval of Whole Time Director or the Company Secretary of the Company preferably in a manner as may be specified by the applicable law.

6. REVIEW / AMENDMENT

The Board may amend, abrogate, modify or revise any or all clauses of this Policy in accordance with the applicable provisions of the Listing Regulations and amendment(s) thereto notified by the Securities and Exchange Board of India and/or Stock Exchanges, from time to time. However, amendments in the Listing Regulations shall be binding even if not incorporated in this Policy.

This Policy is approved by the Board of Directors at its meeting held on 12th February, 2016 and is effective in alignment with Listing Regulations.

Annexure – I

Indicative List of Documents maintained by the Company Law Department

A. List of Documents to be preserved permanently

S No.	Particulars of Documents	Statutory Requirement
1.	Minutes of all meetings of the Board of Directors and its Committees	Rule 25(1)(f) of the Companies (Management and Administration) Rules, 2014
2.	Minutes of General Meetings	Rule 25(1)(e) of the Companies (Management and Administration) Rules, 2014
3.	Register of Members along with the index	Rule 15(1) of the Companies (Management and Administration) Rules, 2014
4.	Register of Charges	Rule 10(4) of the Companies (Registration of Charges) Rules, 2014
5.	Register of Contracts in which Directors are interested	Rule 16 of the Companies (Meetings of Board and its Powers) Rules, 2014
6.	Register of Renewed & Duplicate Share Certificates	Rule 6 of the Companies (Share Capital and Debentures) Rules, 2014
7.	Books and documents relating to the issue of share certificates, including the blank forms of share certificates, in case of disputed cases	Rule 7 of the Companies (Share Capital and Debentures) Rules, 2014
8.	Incorporation documents and documents related to changes in any of the clauses of Memorandum and Articles of Association	Rule 7 of the Companies (Registration Offices and Fees) Rules, 2014
9.	Register of loans, investments, guarantees and securities	Rule 12 of the Companies (Meetings of Board and its Powers) Rules, 2014
10.	Register of Investments not held by Company in its own name	Rule 14 of the Companies (Meetings of Board and its Powers) Rules, 2014

B. List of Documents to be preserved for a period of atleast 8 years

S No.	Particulars of Documents	Statutory Requirement	Preservation Period (In Years)
1.	Copies of Annual Returns prepared under Section 92 and copies of all certificates and documents required to be annexed thereto	Rule 15(3) of the Companies (Management and Administration) Rules, 2014	8
2.	Office copies of Notices, Agenda, Notes on Agenda and other related papers of Board and its Committee meetings	Secretarial Standard - I	8
3.	Office copies of Notices of Annual General Meeting, Scrutinizer's Report and related papers	Secretarial Standard - II	8
4.	The Register of Debenture Holders or any other security holders along with the index	Rule 15(2) of the Companies (Management and Administration) Rules, 2014	8
5.	Register of Deposits	Rule 14 of the Companies (Acceptance of Deposits) Rules, 2014	8
6.	Disclosure of interest by Directors	Rule 9 of the Companies (Meeting of Board and its Powers) Rules, 2014	8
7.	ROC Filings other than Incorporation and changes in any clause of the Memorandum and Article of Association	Rule 7 of the Companies (Registration Offices and Fees) Rules, 2014	8

8.	Instrument creating a charge or modification thereon	Rule 10(4) of the Companies (Registration of Charges) Rules, 2014	8
9.	Books and documents relating to the issue of share certificates, including the blank forms of share certificates	Rule 7 of the Companies (Share Capital and Debentures) Rules, 2014	30