

FFS
DEFENCE ENGINEERING LTD.

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POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS

1. INTRODUCTION

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”) and related applicable provisions as mentioned in Companies Act, 2013. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents. Archival Policy as referred to in Regulation 30 (8) of the Listing Regulations forms part of this Policy. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of Companies Act, 2013.

2. PURPOSE OF THE POLICY

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved for the time limit as per the statutory requirements and to ensure that the records of the Company which are no longer needed or which are not required to be maintained as per the statutory requirements or are of no value are discarded in proper manner, so that no one can have access to such discarded documents, after following the due process for discarding the documents.

As per Regulation 9 of the Listing Regulations mandates that a 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:

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

The classification of the documents has been made in the **Annexure** which forms part of this Policy.

Provided that the Company may keep documents specified in clauses (a) and (b) in electronic mode.

Regulation 30(8) of the Listing Regulations requires the listed companies to disclose on its website all such events or information which has been disclosed to stock exchange(s) pursuant to the various provisions of the Listing Regulations, and such disclosures shall be hosted on the website of the Company for a period of minimum 5 (five) years and thereafter as per the Policy of the Company, as disclosed on its website.

The website of the Company viz., www.ffsdefence.com shall be reviewed on regular intervals for ensuring that all the above mentioned disclosures are available on the website of the Company as required.

3. SCOPE OF THE POLICY

This Policy shall become applicable to all the departments of the Company by virtue of the approval by the Board of Directors of the Company. Each and every department of the Company, are required to maintain certain information, documents, registers and records either as per various statutory requirement in physical mode or in electronic mode. This Policy will ensure that the

Company maintains the both electronic and physical documents as per various statutory requirements and shall be preserved with same degree of confidentiality and care.

4. PRESERVATION OF DOCUMENTS

I. Documents whose preservation shall be permanent in nature

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently. Details of documents whose preservation shall be permanent in nature is listed in **Annexure–A**.

II. Documents with preservation period of not less than eight years:

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a period of not less than eight years shall be preserved accordingly. All the documents/ information furnished to the stock exchanges in compliance with the Listing Regulations, submitted to the Registrar of Companies and/or Ministry of Corporate Affairs in compliance with the Companies Act, 2013 and attendance Registrar for Board Meetings, and recording of attendance of meetings through electronic mode shall be preserved for a period of not less than eight years from the end of the financial year in which the documents/ information is furnished/ submitted or such meeting is held. Details of these documents/ information including any other documents/ information with preservation period of not less than eight years after completion of the relevant transactions is listed in **Annexure-B**.

All modifications and amendments, additions, deletion to such documents shall also be preserved for a period of not less than eight years from the date of such modification, deletions, etc.

5. POLICY REVIEW:

This Policy shall be reviewed from time to time so that the Policy remains compliant with the applicable legal requirements. The Company Secretary & Compliance officer will keep the Policy updated as per applicable statutory guidelines.

This Policy can be modified and/ or amended only with the approval of the Board of Directors.

ANNEXURE – I: DOCUMENTS TO BE PRESERVED PERMANENTLY

Following are the list of documents which shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time:

Item No.	Records/ Documents
1	Certificate of incorporation
2	Certificate for commencement of business
3	Memorandum and Articles of Association (along with the amended copies)
4	Agreements made by the Company with Stock Exchanges, Depositories, etc.
5	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013 and Secretarial Standards
6	All the registers and records as per Companies Act and LODR Regulations
7	Such other records as may be required under any law from time to time
8	Intellectual Property Documents shall include but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs, Intellectual Property rights documents that are owned by the Company shall be retained by the Company permanently
9	All the documents like agreements, application, stamp duty payment receipts for all the properties that are owned in the name of the Company

ANNEXURE – II: DOCUMENTS TO BE PRESERVED FOR EIGHT YEARS

Item No	Records / Documents
1	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2	Annual Returns as per Companies Act, 2013
3	Register of Deposits as per Companies Act, 2013
4	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
5	Annual financial statements including Annual accounts, Directors report, - Auditors report
6	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
7	Income Tax Returns filed under Income Tax Act, 1961
8	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
9	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
10	Copy of newspaper advertisement or publications
11	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases
12	Compliance Reports received from any statutory authority
13	Correspondences made with any statutory authority
14	Register of Power of attorneys, if any
15	Forms and returns filed with RBI/MCA or with any other statutory authority

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