

**DABRIWALA BANIJYA
UDYOG LIMITED**

**SEBI (LISTING OBLIGATIONS AND
DISCLOSURE REQUIREMENTS)
REGULATIONS, 2015**

**POLICY ON PRESERVATION OF
DOCUMENTS – REGULATION 9**

**THE POLICY IS FRAMED PURSUANT
TO REGULATION 9 OF SEBI (LISTING
OBLIGATIONS AND DISCLOSURE
REQUIREMENTS) REGULATIONS, 2015
AND APPROVED BY THE BOARD OF
DIRECTORS IN ITS MEETING HELD ON
12TH NOVEMBER, 2015**

DABRIWALA BANIJYA UDYOG LIMITED

**SEBI (LISTING OBLIGATIONS AND DISCLOSURE
REQUIREMENTS) REGULATIONS, 2015**

POLICY ON PRESERVATION OF DOCUMENTS

The Policy is framed pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

CONTENTS

- I. SHORT TITLE AND COMMENCEMENT
- II. DEFINITIONS
- III. PURPOSE
- IV. MAINTENANCE AND PRESERVATION OF RECORDS
- V. APPROVAL OF POLICY AND MODIFICATION THEREOF

I. SHORT TITLE AND COMMENCEMENT

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 has been notified on 2nd September, 2015.

Regulation 9 of the said regulations will come into force on the ninetieth day from the date of their publication in the Official Gazette.

II. DEFINITIONS

- (i) “**Act**” means the SEBI Act, 1992 read with the Securities Contract (Regulation) Act, 1956 and Companies Act, 2013.
- (ii) “**Board**” means the Board of Directors of the Company or its Committee.
- (iii) “**Company**” means Dabriwala Banijya Udyog Limited
- (iv) “**Document(s)**” means documents as defined in Section 2(36) of the Companies Act, 2013.
- (v) “**Electronic form**” as defined in Section 2(1)(r) of the Information Technology Act, 2000, means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.
- (vi) “**Electronic record**” as defined in Section 2(1)(t) of the Information Technology Act, 2000, means data, record or data generated, image or sound stored, received or sent in an electronic form or micro film or computer generated micro fiche.
- (vii) “**Maintenance**” means maintaining documents and records either physically or electronically.
- (viii) “**Preservation**” means to keep in good order and to prevent from being altered, damaged or destroyed.

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

All other terms used in this Policy have the same meaning as defined in applicable Act, Rules and Regulations.

III. PURPOSE

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires that every listed company shall have a policy for preservation of documents approved by the Board of Directors.

As per the said regulation, the documents should be classified in at least two categories, namely

- (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.

Accordingly, the Policy is framed in the manner prescribed in the Regulation.

IV. MAINTENANCE AND PRESERVATION OF RECORDS

As per requirement of the Companies Act, 2013 some of the documents are to be preserved permanently. There are some other documents which are to be preserved for at least eight years. A list of documents whose preservation shall be permanent in nature and other documents with preservation period of not less than eight years are attached marked ANNEXURE ‘A’ and ANNEXURE ‘B’ respectively.

Pursuant to Section 120 of the Companies Act, 2013 read with Rule 27 of the Companies (Management and Administration) Rules, 2014, Company may maintain its records as required to be maintained under the Act or Rules made thereunder, in electronic form.

: 4 :

V. APPROVAL OF POLICY AND MODIFICATION THEREOF

Pursuant to Rule 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Policy was approved by the Board of Directors of the Company in its meeting held on 12th November, 2015.

The Board has the right to modify the Policy in line with the requirement of law.

Place : Kolkata:

Date : 12th November, 2015

DABRIWALA BANIJYA UDYOG LIMITED**LIST OF DOCUMENTS TO BE PRESERVED UNDER THE COMPANIES ACT, 2013**

SI No.	Section / Rules	Description of documents	Time up to which documents to be preserved
1	Section 186(9) and Rule 12(1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of loans, guarantee, security and acquisition made by the company	Permanently
2	Section 187(3) and Rule 14(1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of investments not held in its own name by the company	Permanently
3	Section 189(1) and Rule 16(1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of contracts with related party and contracts in which directors are Interested	Permanently
4	Section 85 and Rule 10(1) of the Companies (Registration of Charges) Rules, 2014	Register of charges	Permanently
5	Section 88 and Rule 15(1) of the Companies (Management and Administration) Rules, 2014	Register of Members including an index of the names	Permanently and shall be kept in the custody of the Company Secretary or any other person authorized by the Board for such purpose
6	Section 88 and Rule 15(1) of the Companies (Management and Administration) Rules, 2014	Foreign Register of Members	Preserved permanently, unless it is discontinued and all the entries are transferred to any other foreign register or to the principal register
7	Section 118 and Rule 25 of the Companies (Management and Administration) Rules, 2014	Minutes of General Meeting	Preserved permanently and kept in the custody of the Company Secretary or any Director duly authorised by the board or at such other place as may be approved by the Board
8	Section 118 and Rule 25 of the Companies (Management and Administration) Rules, 2014	Minutes of Board or Committee Meetings	Preserved permanently and kept in the custody of the Company Secretary or any Director duly authorised by the board or at such other place as may be approved by the Board
9	Section 46 and Rule 6(3) of the Companies (Share Capital and Debentures) Rules, 2014.	Register of Renewed and Duplicate Share Certificates	Preserved permanently and shall be kept in the custody of the Company Secretary or any other person authorized by the Board for the purpose
10	Section 46 and Rule 7 of the Companies (Share Capital and Debentures) Rules, 2014.	All books and documents relating to the issue of share certificates, including the blank forms of share certificates	Not less than thirty years and in case of disputed cases, shall be preserved permanently

DABRIWALA BANIJYA UDYOG LIMITED**LIST OF DOCUMENTS TO BE PRESERVED UNDER THE COMPANIES ACT, 2013**

SI No.	Section / Rules	Description of documents	Time up to which documents to be preserved
1	Section 128(5)	Books of Accounts including vouchers relevant to any entry in such books of account	Eight financial years preceding current financial year
2	Section 184 and Rule 9(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	Disclosures/ Notices by a Director of his interest	For a period of eight years from the end of the financial year to which it relates
3	Section 73 and Rule 14(1) of the Companies (Acceptance of Deposits) Rules, 2014	Registers of Deposits	For a period of not less than eight years from the financial year in which the latest entry is made in the register
4	Section 85 and Rule 10(1) of the Companies (Registration of Charges) Rules, 2014	The instrument creating a charge or modification	For a period of eight years from the date of satisfaction of charge by the company
5	Section 88 and Rule 15(2) of the Companies (Management and Administration) Rules, 2014.	Register of Debenture holders including an Index of the names	For a period of eight years from the date of redemption of debentures or securities, as the case may be, and shall be kept in the custody of the company secretary of the company or any other person authorized by the Board for such purpose
6	Section 88 and Rule 15(4) of the Companies (Management and Administration) Rules, 2014	Foreign Register of Debenture holders	For a period of eight years from the date of redemption of such debentures
7	Section 88 and Section 92 read with Rule 15(3) of the Companies (Management and Administration) Rules, 2014.	Annual Return and copies of all certificates and documents required to be annexed thereto	For a period of eight years from the date of filing with the Registrar

8	Section 46 and Rule 7(3) of the Companies (Share Capital and Debentures) Rules, 2014	All certificates surrendered to a company shall immediately be defaced by stamping or printing the word "cancelled" in bold letters	May be destroyed after the expiry of three years from the date on which they are surrendered, under the authority of a resolution of the Board and in the presence of a person duly appointed by the Board in this behalf
9	Rule 18 of the Companies (Share Capital and Debentures) Rules, 2014	Debenture Trust Deed	Preserved for such period as may be stipulated by the Board