

**UNITED VAN DER HORST LIMITED**  
**POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS**

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### **Introduction:**

Corporate records are valued as corporate assets and include all documents/ records that are in physical or electronic form. The Company has a strategic objective of ensuring that significant documents are safeguarded and preserved to ensure the longevity of important documents including its electronic resources.

The Company is required to maintain certain types of corporate records for a specified period under applicable corporate/ securities laws, including but not limited to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (**“SEBI Listing Regulations”**), and the Companies Act, 2013.

Records may be preserved for longer periods of time where required under any other Applicable Laws

Regulation 9 of the SEBI Listing Regulations requires listed entities to have a Policy on the Preservation of documents approved by its Board of Directors, classifying the documents into at least two categories, which are as follows:

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

Regulation 30(8) of SEBI Listing Regulations requires listed entities to disclose on their website all such events or information that has been disclosed to stock exchange(s) under SEBI Listing Regulations, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

This Document Preservation & Archival Policy (**“Policy”**), as adopted by the Board of Directors (**“Board”**) deals with the preservation/retention and archival of the corporate records and public disclosures of United Van Der Horst Limited (**“Company”**).

### **Objective:**

Since the disposition phase of the records is critically important from the perspective of legal and economical maintenance of records, therefore, it becomes imperative to retain those records having long-term value for permanent storage and to suitably deal with the records having relevance for a specific period of time. Through this Policy, the Company seeks to preserve and manage the records in a consistent and logical manner.

### **Scope:**

The Policy aims to define a framework for the maintenance of documents by classifying them into two categories i.e. those which are to be preserved permanently and those which should be kept for at least eight (8) years. The Policy lists the statutory documents and lays the guidelines for the preservation and disposal thereof.

**Definitions:**

- 1) **“Act”** means the Companies Act, 2013 and Rules framed thereunder and any amendments thereto.
- 2) **“Board”** means the Board of Directors of the Company.
- 3) **“Maintenance”** means keeping registers and records, either physically or in electronic mode as may be permitted under any law for the time being in force, and includes the making of appropriate entries therein, the authentication of such entries, and the preservation of such registers and records.
- 4) **“Policy”** means Board Policy on Preservation of Documents.
- 5) **“Preservation”** means to keep in good order; to prevent them from being damaged or destroyed.
- 6) **“Record”** means documentary evidence of past events or transactions.
- 7) **“Register”** means a register maintained under the Act or the Securities and Exchange Board of India Act, 1992.
- 8) **“SEBI Listing Regulations”** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

**Mode of Preservation of Documents/Records:**

The Documents/Records of the Company may be preserved either in physical or electronic form.

The relevant Head of Departments of the Company shall be responsible to ensure the maintenance and preservation of Documents and Records

**Period of Preservation of Documents/Records:**

**The Documents whose preservation shall be permanent in nature are as follows:**

1. Incorporation documents
2. Memorandum and Articles of Association (along with amendments)
3. Registration Certificates
4. Licenses & Statutory Approvals
5. Statutory Registers required under applicable laws
6. Minutes of General Meeting
7. Minutes of Board Meeting
8. Minutes of various Committee Meetings
9. Listing Agreements executed with the stock exchanges
10. Policies approved by the Board/ Committees.

11. Investment Documents/proofs including certificates etc.
12. Orders issued by Courts/Statutory bodies
13. Material Agreements/Contract
14. Annual Reports.
15. All books and documents relating to the issue of share certificates, including blank forms of Share certificates
16. Any other documents as may be required to be maintained and preserved permanently in accordance with applicable statutes, law(s), rules, and regulations from time to time.

The documents of a permanent nature shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, and deletions in the documents shall also be preserved permanently by the Company.

**The Documents whose preservation period shall not be less than eight years after completion of the relevant transactions are as follows:**

1. Attendance register of Board and Committee of Directors
2. All papers incidental or supplementary to the Board meetings, general meetings, and all committee meetings.
3. Office copies of Notices, Agenda, Notes on Agenda and other related papers
4. Annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto
5. Declarations received from Directors, KMP, and designated employees
6. Correspondence with Directors, KMP, and designated employees
7. Reports/ declarations received from various departments
8. Insurance Policies/ Claims under various policies
9. Non-Statutory Registers/Documents
10. All submissions made to the stock exchanges in compliance with the listing agreements.
11. Instruments creating a charge on the properties of the Company till the charge is outstanding or 8 years, whichever is later.
12. Any other documents as may be specified by SEBI or as may be required to be maintained and preserved in accordance with the applicable statutes, law(s), rules, and regulations from time to time.

Matters in respect of which no period is prescribed for the preservations/retention may be preserved/retained for such period as may be required in the ordinary course of business.

The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the Rules made thereunder, the Secretarial Standards, the Listing Agreement and the SEBI Regulations, and any all other applicable laws, rules, regulations, internal policies of the Company, in force.

### **Destruction of Documents/Records:**

The documents/records preserved shall be reviewed by the respective department from time to time, and for those which are due for disposal, the respective department shall take appropriate action to destroy the same at the appropriate time. The authorization to destroy such documents/records shall be given by the Head of the Department.

Documents/Records preserved in physical form that are sensitive and/or confidential in nature may be destroyed by a paper shredder.

Documents/Records in electronic form shall be destroyed by using appropriate techniques so the data cannot be reconstructed/retrieved from the storage media wherever it had resided.

The periodicity of the retention/preservation shall be reviewed from time to time to ensure that no documents are retained beyond the period prescribed by the Policy unless required otherwise.

### **Archival of Documents/Records:**

1. **Financial Data:** The website of the Company provides access to financial documents/information for existing and potential stakeholders which are regulatory in nature, including annual reports and financial results.
2. **Press Releases and News Announcements:** The Company's website provides information/data that is relevant to the media, researchers, or investors who seek information on the growth of the Company and significant events of the past. This shall also include events or transactions or information which is disclosed by the Company to the Stock Exchanges in terms of Regulation 30 of the SEBI Listing Regulations.

The aforesaid information shall be displayed on the website of the Company for a period of five years from the date of its publication. The aforesaid information which is more than 5 (five) years old, or such other period as prescribed by the Regulations and/or applicable law and thereafter shall be archived for a further period as may be decided by the Board.

### **Review and Amendment:**

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant regulation and remains effective. The Board of Directors has the right to alter, modify, add, delete, or amend any of the provisions of this policy at its discretion and the new policy shall be displayed to the stakeholders.

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.

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