carver
ROBOWELD LIMITED

POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

A. 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 Companies Act, 2013. SEBI has mandated all the listed entities to have a policy on Preservation and Archival of 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.

B. PURPOSE:

The purpose of this document is to present a high-level policy statement for Carver Roboweld Limited ("the Company") regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 ("the Act"), SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Regulation") and any other applicable laws to the Company.

Accordingly, the Policy named Policy on Preservation and Archival of Documents ("the Policy") has been formulated and adopted by the Board of Directors ("the Board") of the Company.

C. CLASSIFICATION:

Based on the recommendation of the management of the Company, the Board of Directors has identified following classes for Preservation and archival of various documents;

Sr. No.	Category	Annexures
1	Documents that need to be preserved permanently	Annexure-A
2	Documents that may be preserved for a period of 08 years or more after completion of the relevant transactions	Annexure-B
3	Other documents which may be preserved for less than 08 years	Annexure-C

D. MODE OF PRESERVATION & RESPONSIBILITY

The Authorized Person shall:

a. preserve the Documents either in physical form or electronic form;

b. preserve the Documents in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents;

c. ensure that the preserved Documents are accessible at all reasonable times;

d. control access for preserved Documents, to ensure integrity and confidentiality of the Documents and prohibit unauthorised access;

e. make appropriate provisions for back up of all preserved Documents, both physically and electronically.

E. DESTRUCTION OF DOCUMENTS:

After the expiry of the retention period, the Authorized Person may destroy the preserved Documents in such a mode as deemed fit. The Compliance Officer or/and Managing Director of the Company shall approve the destruction of such Documents.

The Authorized Person shall maintain a register of disposal of records, with details of Documents destroyed in the format prescribed in the guidance manual. This applies to both physical and electronic Document.

F. ARCHIVAL POLICY:

The Company will host all the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the SEBI Listing Regulations on the website of the Company under the section entitled ["Investor Relations"] for a period of five years and thereafter the same shall be archived for retrieval for such period as decided by the Compliance Officer or/and Managing Director of the Company.

Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary of the Company.

This Policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.

G. INTERPRETATION

In any circumstance where the terms of this Policy are inconsistent with any existing or newly enacted law, rule, regulation or standard governing the Company, the said law, rule, regulation or standard will take precedence over this Policy.

H. AMENDMENT

Any change in the Policy shall be approved by the Board. The Board shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding. Any subsequent amendment/modification in the Act or the rules framed thereunder or the SEBI Listing Regulations and/or any other laws in this regard shall automatically apply to this Policy.

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Annexure-A

Documents / Record whose preservation shall be permanent in nature

Sr. No.	Documents / Records
1.	Certificate of Incorporation- (COI)
2.	Memorandum and Articles of Association - (MOA) & (AOA)
3.	Agreements made by the Company with stock exchanges, depositories, etc
4.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act and as per the applicable Secretarial Standards
5.	Register and Index of Members, debenture-holders, if any or other security holders, if any
6.	Register of Contracts as per Companies Act
7.	Register of Charges as per Companies Act
8.	Register of Investments as per Companies Act
9.	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
10.	Authorization / licenses obtained from any statutory authority
11.	Policies of the Company framed under various regulations
12.	Register of disposal of records
13.	Annual Reports of the Company
14.	Material Agreements of the Company
15.	Such other records as may be required under any law from time to time

Annexure-B

Documents / Records to be preserved for a minimum period of eight years.

Sr. No.	Documents / Records
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 Director's report Auditors report
6.	Books of accounts including Vouchers / Voucher register as defined under 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
10.	Copy of newspaper advertisement or publications
11.	Compliance Reports received from any statutory authority
12.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
13.	Disclosure/Return filed under SEBI Listing Regulations
14.	Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers
15.	Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM)
16.	Any other Document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act and/or the SEBI Listing Regulations

Annexure-C

List of Documents available on the website of the Company.

Sr. No.	Documents / Records
1.	Basic information about the Company including the details of its businesses
2.	All information and/or Documents required to be posted on the website as specified in the Companies Act, 2013 and/or Regulation 46(2)/Regulation 30 of the SEBI (LODR) Regulations, 2015.
3.	All Documents required to be filed with Stock Exchanges under aforesaid Regulations.
4.	Any changes in the content shall be updated within 2 working days on the website.
5.	The information/Documents provided on the website shall be for current financial year & for preceding five financial years.