



POLICY ON PRESERVATION OF DOCUMENTS
Effective date: 30th November, 2015
Version: 2
Last Review Date: January 30, 2024

1. Scope :

A policy on preservation of Documents would ensure safekeeping of the records and documents, while at the same time avoiding superfluous inventory of Documents. The Company (ADF Foods Ltd.), therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations"), on preservation of the Documents.

2. Definitions:

- 2.1 "Applicable Law" means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Companies Act, 2013 and all the rules, provisions and regulations made thereunder.
- 2.2 "Authorised Person" means the Company Secretary, Chief Financial Officer, General Manager (Finance & Accounts) and/or any other person duly authorised by the Board.
- 2.3 "Board" means the Board of directors of the Company or its Committee.
- 2.4 "Company" means ADF Foods LIMITED.

3. Classification :

The preservation of Documents shall be done in the following manner:

- (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.

An indicative list of the Documents and the timeframe of their preservation is provided in **Annexure I**.

4. Modes of preservation :

- 4.1. The Documents may be preserved in
- a. physical form or
 - b. Electronic Form.



- 4.2. The Authorised Person is expected to observe the compliance of requirements of Applicable Law.
- 4.3. The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.
- 4.4. The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

5. Custody of the Documents:

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

6. Authority for approval of Policy :

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted via the Regulations.

***7. Review:**

The policy will be reviewed by the Managing Director and/or the Whole Time Directors on annual basis and they will be severally authorised to carry out the necessary amendments therein as per the amendments in SEBI (Listing Obligations & Requirements) Regulations, 2015

* The amendments have been carried out on 21st December, 2017

For **ADF Foods Limited**

Bimal R. Thakkar
Managing Director
DIN: 00087404

Annexure I

Indicative List:

Particular		Documents to be preserved for 5 years	Mode of Preservation: Physical /Electronic (For A & B)	Location of the documents (Place where preserved)
A. Documents to be preserved permanently	B. Documents to be preserved for 8 years or more			
1. Memorandum & Articles of Association of the Company 2. Registers of investments in securities not held in the name of the Company 3. Register of charges 4. Register and index of members 5. The foreign register of members 6. Register of renewed and duplicate certificates 7. Register of contracts in which directors are interested 8. Register of Directors, Managing Director, Manager and Secretary 9. Register of directors' shareholding 10. Register of inter corporate loans and investments 11. Register of documents executed under common seal 12. Register of records and documents destroyed 13. Register of transfer	1. Register of buy-back of securities. 2. Register and index of debenture holders - 15 years from the date of redemption of debentures. 3. Register of deposits. 4. Register of allotment. 5. Register of payment of dividend. 6. Register of Director's attendance. 7. Register of postal ballot - Until the resolution has been implemented or for a period of 10 years whichever is later. 8. Register of proxies. 9. Register of inspection 10. Register of investor's complaints. 11. Register of employee stock options - 15 years from the date of exercise of options. 12. Register of sweat equity shares. 13. Books of Accounts. 14. Annual Return.	1. Register of SEBI (Prohibition of insider trading) Regulations, 2015. 2. Price Sensitive Information and the disclosures to be made under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Physical	Corporate Office of the Company at Marathon Innvoa, B2, G01, Ground Floor, G.K. Road, Lower Parel, Mumbai – 400013.

Ro



of shares				
14. Register of transmission of shares				
15. Register of transfer of debentures				
16. Register of transmission of debentures				
17. Register of investment (other than securities not held in the name of the company)				
18. Register in respect of SEBI (substantial acquisition of shares and takeovers) Regulations, 1997				
19. Minutes book of general meeting, Board meetings and Committee meetings				

gr