

PRESERVATION OF DOCUMENT & ARCHIVAL POLICY

**PACHELI INDUSTRIAL FINANCE LIMITED
(Formerly known as “Dhoot Industries Limited”)**

(CIN: L67120MH1985PLC037772)

Regd. Office: C-001, Prathmesh Horizon, New Link Road,
Borivali (West), Mumbai – 400092.

Table of Contents

| | |
|---|-----------------------|
| 1 | Preamble |
| 2 | Scope |
| 3 | Objective |
| 4 | Definition |
| 5 | Interpretation |
| 6 | Guidelines |
| 7 | Mode of Preservation |
| 8 | Record to be Archived |
| 9 | Policy Review |

1. Preamble

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as “SEBI (LODR) Regulations” or “Regulations”] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

2. Scope

This Policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. Objectives

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same

4. Definition

“**Act**” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;

“**Regulations**” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;

“**Company**” shall mean Pacheli Industrial Finance Limited (Formerly known as “Dhoot Industries Limited”);

“**Current**” means running matter or whatever is at present in course of passage;

“**Board of Director**” or “**Board**”, means the collective body of the Directors of the company;

“**Policy**” means, Preservation of Documents and Archival Policy.

“**Maintenance**” means keeping Documents, either physically or in Electronic Form.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

5. Interpretation

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

6. Guidelines

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the 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;

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

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- documents that needs to be preserved and retained permanently;
- documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI (LODR) Regulations;
- documents that needs to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company.
- where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”.

An indicative list of the Documents and the time-frame of their preservation is provided in **Annexure- A**.

7. Modes of Preservation

The Documents may be preserved in;

- Physical form; or
- Electronic Form.

The official of the Company is required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

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.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

Destruction of documents;

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure A** may be destroyed.

8. Record to be archived

In accordance with the Regulation 30 (8) of SEBI (LODR) Regulations, 2015, the Company shall ensure that all information shall be hosted on the Company's website (www.provogue.com) for a period of 5 years and thereafter will be archived for a period of 1 year.

9. Policy Review

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

Annexure A

Indicative list:

A. Permanent Preservation;

- a. Minutes books of Board, General Meetings and Committee Meetings
- b. Statutory Registers
- c. License and Permissions
- d. Statutory Forms and disclosures except for routine compliance
- e. Scrutinizers' Reports
- f. Register of Members
- g. Index of Members
- h. Instrument creating a charge or modification

B. Temporary Preservation upto 8 Years;

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. Office copies of Notice of General Meeting and related papers
- e. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers
- f. All notices pertaining to disclosure of interest of directors
- g. Books of accounts, financial statements etc
- h. Register of debenture holders or any other security holders

C. Others;

As per applicable law
