

BHATKAWA TEA INDUSTRIES LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

The Securities Exchange Board of India has released the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations, 2015). By virtue of the said Regulations, 2015, Bhatkawa Tea Industries Limited (the “Company”) is required to frame a policy on preservation of documents to aid the employees in handling documents efficiently. It not only covers the various aspects on preservation of the Documents, but also facilitates the safe disposal/ destruction of the documents and keeping a record of the same.

DEFINITIONS

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

“Board” means the Board of Directors of the Company or its Committees.

“Company” means Bhatkawa Tea Industries Limited.

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

“Document(s)” shall include Minutes, Returns, Registers, Books, Forms etc required to be filed and maintained under the Act or under SEBI laws.

“Electronic Form” means any contemporaneous electronic device such as computer, laptop, compact disc, Floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

“Maintenance” means keeping documents, either physically or in electronic form.

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

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

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

POLICY FOR PRESERVATION OF DOCUMENTS

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 –

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

- a. Documents that need to be preserved and retained permanently;
- b. Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;
- c. Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- d. 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 – I**.

MODES OF PRESERVATION

The Documents may be preserved in:

- a. Physical form; or
 - b. Electronic Form
- The Authorized Person shall be required to preserve the Documents covered under this policy.

- 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 Authorized Person with preservation, so as to ensure integrity of the Documents and to prohibit unauthorized access.

DESTRUCTION OF DOCUMENTS

The temporary documents of the Company which are no longer required as per the time schedule prescribed in the Annexure I may be destroyed. The Authorized officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under Annexure I. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records, which shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction to be kept by Employees who are disposing of the documents in the format prescribed at Annexure II. The entries in the register shall be authenticated by the Authorized Person.

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.

AMENDMENT

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.

ANNEXURE- I

(Indicative list)

Permanent Preservation	Temporary Preservation
<ul style="list-style-type: none">• Common seal of the Company.• Register of members and Index of Members.• Register of charges.• Statutory Registers.• Minutes books of Board, General Meetings and Committee Meetings.• License and Permissions.	<ul style="list-style-type: none">• Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and documents required to be annexed thereto(8 years from the date of filing with the Registrar)• All notices pertaining to disclosure of interest of directors (8 years from the date of Board Meeting in which it is taken note of)• Office copies of Notices, scrutinizer's report, and related papers (as long as they remain current or for 8 financial years), whichever is later.• Instrument creating a charge or modification (8 years from the satisfaction of charge)• Books of Accounts including vouchers relevant to any entry in such Books of Accounts (8 years from the end of the financial year to which it relates)

- All Other documents of the Company shall be maintained in compliance with the requirements of the applicable laws.

ANNEXURE- II

Specimen format of the register of documents disposed-off/destroyed

Particulars of document along with Provision of Law	Date and Mode of Destruction	Initials of the Authorized Person