



**MONARCH**  
NETWORK CAPITAL

**Monarch Network Capital Limited**

**POLICY ON PRESERVATION OF  
DOCUMENTS**

## INTRODUCTION

Securities and Exchange Board of India (SEBI) issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') with the aim to consolidated and streamline the provisions of existing listing agreements for different segments of capital markets such as equity shares (including convertibles), non-convertible debt securities, etc. and disclosure norms in relation thereto, thereby ensuring better enforceability. The said regulation has been made effective from 1st December, 2015 and the said regulations require that every listed company shall require to have preservation of documents policy.

## OBJECTIVE

The main aim of creating this policy is to ensure that all statutory records are preserved for as long as prescribed in the law without being tempered, mutilated or amending in any manner by the authorized persons of the company either in physical or electronic form. Further this policy also ensures that records which are no longer required or after being completion of timeframe prescribed under the law for its preservation are being destroyed in accordance with this policy by the officers authorized by the Board of Directors of the Company.

## DEFINITIONS

- i. **Act means** the Companies Act, 2013 and rules made thereunder and amendments made therein from time to time.
- ii. **Regulations** means Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 and amendment made therein from time to time.
- iii. **Board of Directors** means the collective body of the Directors of the Company.
- iv. **Policy** means the Preservation of Documents Policy.
- v. **Maintenance** means to keep the documents either in physical or electronic mode.
- vi. **Preservation** means to keep the documents in good order and to prevent from being alter, damaged or destroyed

## POLICY AND PROCEDURES

Pursuant to the provisions of regulation 9 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, company has prepare this Preservation of Documents Policy duly approved by the Board of Directors of the Company classifying the documents into two categories as follows

- (i) Documents whose preservation shall be permanent in nature
- (ii) Documents with preservation period of not less than eight years after completion of relevant transactions

Accordingly the company will preserve the documents in the above mentioned manner and also preserve the other documents that's require to be preserved and retained for such period as required under any statute, regulations, stipulation of court, tribunal or quasi-judicial body. A list of documents and the time period for their preservation is given in the **Annexure - 1**.

## **MANNER OF PRESERVATION**

The regulation provides that the documents may be preserved either in electronic form or in physical form. The responsibility of preserving various documents of the company lies on the concerned officer in charge of various departments of the company. The preservation of documents should be such that it does not give any chance of tampering, alteration, destruction or anything endangering the content, authenticity, utility or accessibility of the documents. The documents preserved should be accessible by the authorized person and all such documents mention above shall be destroyed after completion of the time frame prescribed above by the authorized person. All such destruction should be done by the authorized person and recorded in the register maintained for such purpose.

## **REVIEW OF THE POLICY**

The above policy will be reviewed by the Board of Directors from time to time and changes will be made therein in accordance with the legal requirements.

## ANNEXURE - 1

### I. Documents to be preserved permanently

- Memorandum and Articles of Association as amended from time to time.
- Certificate of Incorporation
- Register of Contracts with Related Parties.
- Register of Directors and KMPs and the securities held by them.
- Register of Loans, Guarantees, Security and Investments made by the Company.
- Register of investments not held in its own name by the Company, if any
- Register and Index of Members.
- Foreign Register of Members, if any
- Register of contracts or agreements in which Directors are interested.
- Register of Charges,
- Minutes of the Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots.
- Resolutions passed by Circulation.
- Various Forms and returns filed with the Authorities.
- Audited Financial Statements.
- Register of Renewed and Duplicate Share Certificate
- Register of Transfers and Transmission of shares / Debentures and other securities
- Forms, Scrutinizers Reports
- Certificate of Registration issued by SEBI and/or any other regulating authority
- Listing Agreement executed with the Exchanges.
- Trading approval relating to listing of securities.
- Such other records as may be required under any law from time to time.

### II. Documents to be preserved upto Eight Years

- Register of Buy-back of Securities from the date of completion of buy-back
- Notices, Agenda and Notes to agenda and Attendance Register of the Board, Committees of the Board General Meetings and Postal Ballots.
- Instrument creating Charge or Modification thereof – 8 years from the date of satisfaction of charge
- Register of Debenture Holders and Debenture Trust Deed from the date of its redemption.
- Books of Accounts including vouchers and bills.
- Annual Returns together with the Annexures.
- Scrutinizer's Report on Postal Ballot and AGM.
- Documents relating to appointment of Managerial Personnel.
- Dividend reconciliation statement till the time the dividend is transferred to IEPF.
- Correspondence with shareholders
- Postal Ballot forms
- Scrutinizer's Reports on voting at General Meetings/ Postal Ballot
- Newspaper cuttings of notices of Board Meeting and Financial Results
- Investor meet presentations
- Annual Returns
- Notice of Interest by Directors and Key Managerial Personnel
- All reports filed with the stock exchanges from time to time.
- Such other records as may be required under any law from time to time.

### III. Other Documents

As prescribed under the applicable regulation or otherwise by court, tribunal or quasi-judicial body.