

**GOENKA BUSINESS & FINANCE LTD**

**CIN:L67120WB1987PLC042960**

## **POLICY ON PRESERVATION OF DOCUMENTS**

This policy is framed in accordance with the requirements of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 ('Regulations') Further, Regulation 30(8) requires the Company to frame a Policy on disclosure of all material events or information which has been disclosed to stock exchange(s) on its website and archival of such disclosures.

### **1. Objectives**

The objective of this Policy is to specify the type of document(s) and time period for preservation thereof, classifying them in the following categories:

- a) Documents whose preservation shall be permanent in nature;
- b) Documents with preservation period of not less than 8 years after completion of relevant transaction.

The documents specified in the above para (a) and (b) may be kept in electronic mode.

### **2. Definitions**

'Act' shall mean the Companies Act, 2013 and the Rules framed thereunder, including any modifications, clarifications, circulars or re-enactment thereof.

'Board of Directors or Board' means the Board of Directors of OnGoenka Business & Finance Limited, as constituted from time to time.

'Company' means Goenka Business & Finance Limited.



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'Documents' means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.

### **3. Classification of Documents**

The company shall maintain and preserve documents as specified hereunder:

**Category (A):** The documents of permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

**Category (B):** The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in Annexure 2) shall be preserved by the Company for the term not less than eight year after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

### **4. Roles and Responsibilities**

The respective Departmental Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy.



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## **5. Archival Policy**

Pursuant to the requirement under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, the Company shall disclose on its website all such events or information which has been disclosed to the stock exchange(s) for a minimum period of five years and thereafter to be archived for a period of three years.

## **6. Amendments to the Policy**

The Board of Directors may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

This Policy will be communicated to all employees and other concerned persons of the Company and shall be placed on the website of the Company .



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**Annexure 1**

**Documents whose preservation shall be permanent in nature:**

<b>Sr. No.</b>	<b>Documents</b>
1	Minutes of Board Meeting
2	Minutes of various Committee Meetings
3	Agenda papers of the Board and Committee meetings
4	Minutes of General Meetings
5	Statutory Registers and Returns
6	Property Records, Intellectual Property Records, Legal Documents, Contracts/Agreements
7	Certificates of statutory registrations
8	All the filings with MCA, ROC, Stock Exchanges, SEBI, RBI and any other regulatory agency
9	Memorandum of Association and Articles of Association of the Company
10	Annual Reports
11	Any other Register or Record or document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

**Annexure 2**

**Documents with preservation period of not less than eight years after completion of the relevant transactions:**

<b>Sr. No.</b>	<b>Documents</b>
1	Books of accounts and vouchers
2	Taxation records
3	Press releases
4	Insurance records
5	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

