



POLICY ON PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY

1. Introduction:

In terms of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations') the Company is required to formulate a policy on Preservation of Documents which is required to be maintained under the Listing Regulation.

In terms of Regulation 30(8) SEBI (Listing (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations') the Company is required to formulate an Archival policy for disclosure of all material events/ information of the Company specified in Schedule III of the Listing Regulation.

2. Objective of the Policy:

The objective of the policy is to preserve the documents of the Company for the period mentioned under Regulation 9 of SEBI (Listing (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations') and to archive any of the material events/ information which are disclosed to the Stock Exchange and placed on the website of the Company prior to a period of 5 years in terms of Regulation 30(8) SEBI (Listing (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('the Regulations')

3. Preservation of Documents:

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, the Secretarial Standards, the Listing Regulations and other rules, regulations as may be applicable to the Company from time to time. The documents which is required to be preserved under Listing Regulations shall be classified into following two categories;



- a) Documents shall be preserved permanently. The documents/ registers/ record which are permanent in nature is set out in **Annexure I** subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that such modifications, amendments, addition, deletion or any changes made therein shall also be preserved permanently by the Company.
- b) Documents shall be preserved for a period not less than eight years after completion of the relevant transactions. The documents/ registers/ record which are to be preserved for a period not less than 8 years is set out in **Annexure II** subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. Provided that such modifications, amendments, addition, deletion or any changes made therein shall also be preserved for a period not less than 8 years.

4. Archival Policy:

In line with Company's policy on Determination of materiality of events and as per the Listing Regulation, the Company shall disclose all such events to the Stock Exchange and such disclosure shall be hosted on the website of the Company for a minimum period of 5 years from the date of the disclosure and same shall be archived from the website of the Company for a further period of 3 years. After the expiry of the statutory retention period, the preserved document may be destroyed.

5. Mode of Preservation:

The documents may be preserved in physical form or Electronic form. The retention period for preservation of documents shall remain the same irrespective of maintenance of documents in physical or electronic format.

4. Disclosure:

The Policy will be disclosed on the website of the Company viz. www.dai-ichiindia.com



5. Amendments to the Policy:

In case of any subsequent amendments to the Listing Regulations which make any of the provisions in the Policy inconsistent, the provisions of the Listing Regulations shall prevail. Any amendment in this policy shall be promptly disclosed on the Company's website pursuant to applicable laws and regulations, together with details about the nature of the amendments.



Sr. No	Annexure I (Documents preserved permanently)	Annexure II (Documents preserved for minimum 8 years)
1	The Memorandum of Association and Articles of Association and Certificate of Incorporation.	Annual reports and Annual returns of the Company
2	Certificate of Change of name, Certificate for Conversion of Company into Private Limited.	Disclosure to Stock Exchange, Registrar of Companies (MCA), Takeover Code, NSDL & CDSL.
3	Minutes of Board/ General Meeting and various Committee meetings	Approval received from Central Government, Registrar of Companies (MCA), SEBI, Stock Exchange
4	Statutory registers as mandated under Companies Act, 1956/ Companies Act, 2013, Secretarial Standards, any other rules, regulations as may be applicable to the Company from time to time	Documents on which common seal of Company has been affixed
5	Agreements entered with Statutory authorities and License issued by Regulatory authorities	Notice & Agenda of Board, General and Committee meeting
6	Intellectual Property documents that are owned by the Company	Declaration given by directors under Section 184 & Section 164 of the Companies Act, 2013
7	Such other records as may be required under any law(s), from time to time	Declaration given by Independent Directors
8		Books of accounts together with the voucher relevant to entries in such books of account
9		Such other records as may be required under any law(s), from time to time