



## **INDIAN EXTRACTIONS LIMITED**

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**'POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY'**

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**1. Introduction:**

The Board of Directors (The “Board”) of Indian Extractions Limited (the “Company”) has adopted the following policies and procedures with regard to ‘Preservation of Documents’ and ‘Archival Policy’ as defined below. The Board may review and amend these policies from time to time.

The ‘Policy for Preservation of Documents’ is framed under Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”) and the ‘Archival Policy’ is framed under Regulation 30(8) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

**2. Policy Objective:**

To determine the documents required to be preserved by the Company and to provide the archival policy of the Company for the documents hosted at the website of the Company.

**3. Interpretation of the Policy:**

All the Words and expressions used in this Policy, unless defined hereinafter, shall have meaning respectively assigned to them under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and in the absence of its definition or explanation therein, as per the Companies Act, 2013 and the Rules, Notifications and Circulars made/issued thereunder, as amended from time to time.

**4. Definitions:**

**“Authorised Person”** means any other person being so authorised by the Board of Directors of the Company including Managing Director and/or Whole time Director and/or Chief Financial Officer and/or Company Secretary and Compliance Officer of the Company.

**“Board of Directors or Board”** means the Board of Directors of Indian Extractions Limited, as constituted from time to time.

**“Company”** means Indian Extractions Limited.

**“Listed Entity”** means an entity which is listed, on a recognised stock exchange(s); the designated securities issued by it or designated securities issued under schemes managed by it, in accordance with the listing agreement entered into between the entity and the recognised stock exchange(s).

**“Website”** means [www.Nanavatigroup.com](http://www.Nanavatigroup.com).

**5. Policy on Preservation of Documents:**

The documents required to be preserved are classified in the following (3) Three categories, namely:

- I. ***Documents to be preserved permanent in nature; [Annexure-A]***
- II. ***Documents to be preserved not less than (8) eight years after completion of relevant transaction; [Annexure-B] and***

**III. Documents hosted on the website to be preserved not less than (5) five years.[Annexure-C]**

**6. Preservation of Documents:**

The documents which are required to be preserved as per the above stated Annexure shall be preserved either in physical copy or in electronic copy. The documents shall be preserved in good condition and in secured place in the office premises and Board may authorise a person to monitor the same.

**7. Time Limit for preserving the documents:**

The Company shall preserve the documents given in Annexure A, B and C within 2 days without any delays and shall maintain it in good condition.

**8. Disclosure to be made at the Website of the Company:**

The Company shall disclose on its website all such events or information which has been disclosed to Stock Exchange(s) under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 - Disclosure of event and information policy of the Company, and such disclosures shall be hosted on the website of the Company at [www.Nanavatigroup.com](http://www.Nanavatigroup.com) for a minimum period of (5) five years.

Further in case of any change in the content of the website shall be updated within 2 working days from the date of such change in content.

**9. Archival Policy:**

In accordance with the provisions of the Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company shall ensure that all the information and events require to be disclosed to Stock Exchange(s) under the Regulation 30 shall be hosted on the website of the Company at [www.Nanavatigroup.com](http://www.Nanavatigroup.com) for a minimum period of (5) five years and thereafter shall be archived by the IT Department of the Company for a period not less than (1) One year.

**10. Disposal of documents:**

The documents which are required to be preserved as per the policy shall after the term expired other than the documents mentioned in Annexure - A, shall be disposed off by the order of the Board and in the presence of at least 2 authorised persons. Further before disposing off the documents, it shall be preserved in the soft copy for future record, if deemed necessary.

**11. Policy Review:**

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications.

**BY THE ORDER OF THE BOARD  
FOR INDIAN EXTRACTIONS LIMITED**

**SD/-  
PRIYAM SHANTILAL JHAVERI  
CHAIRMAN & MANAGING DIRECTOR**

**Annexure-A**

**Documents to be preserved permanent in nature**

Following documents are required to be preserved permanent in nature and shall be modified from time to time as decided by the Board of Directors of the Company following the SEBI (LODR) Regulations, 2015, Companies Act, 2013 and all other applicable laws, rules and regulations made under various laws.

S. No	Nature of documents
<b>Physical or Electronic Copy</b>	
1.	<ul style="list-style-type: none"><li>▪ Incorporation and Commencement certificates.</li><li>▪ Common Seal.</li><li>▪ Memorandum and Article of Association as amended from time to time.</li><li>▪ Annual Reports filed with ROC.</li><li>▪ Minutes of General, Board and Committee Meetings.</li><li>▪ Statutory Registers required to be maintained under Companies Act, 2013 and any act before and after Companies Act, 2013.</li><li>▪ Certified True copy of Board, Committee and General Meeting Resolution.</li><li>▪ Share Transfer Deeds and correspondence made thereof.</li><li>▪ Agreement with Stock Exchange(s).</li><li>▪ Agreement with Depositories.</li><li>▪ Agreements with other statutory bodies.</li><li>▪ Documents related to registration of Intellectual Property Rights.</li><li>▪ Documents related to acquisition and sale of property.</li><li>▪ Other agreements and Contracts related to property</li><li>▪ Charge related documents.</li></ul>
<b>Website</b>	
2.	<ul style="list-style-type: none"><li>▪ Details of business carried on by the Company.</li><li>▪ CIN of the Company.</li><li>▪ Terms and Conditions of appointment of Independent Directors.</li><li>▪ Composition of Various Committees of the Board.</li><li>▪ Code of Conduct for Board of Directors and Senior Management Personnel</li><li>▪ Various Policies and codes required by the SEBI (LODR), 2015 and Companies Act, 2013</li><li>▪ Email Address and Contact Information of Authorized person of Grievance Redressal Cell</li><li>▪ Details of Share Transfer Agent of the Company.</li></ul>

**Annexure-B**

**Documents to be preserved not less than (8) eight years**

Following documents are required to be preserved for not less than (8) eight years and shall be modified from time to time as decided by the Board of Directors of the Company following the SEBI (LODR) Regulations, 2015, Companies Act, 2013 and all other applicable laws, rules and regulations made under various laws.

<b>S. No</b>	<b>Nature of documents</b>
1.	<ul style="list-style-type: none"><li>▪ ITR and Computation</li><li>▪ Journal, Cash and bank vouchers.</li><li>▪ Sales and Purchase Book.</li><li>▪ Bank Statements.</li><li>▪ Insurance related documents.</li></ul>
2.	<ul style="list-style-type: none"><li>▪ Non Statutory Registers</li><li>▪ Quarterly Results filed with Stock Exchange(s)</li><li>▪ Quarterly Shareholding Pattern filed with Stock Exchange(s)</li><li>▪ Quarterly/Half Yearly Compliances filed with Stock Exchange(s)</li><li>▪ Prior Intimations made to stock Exchanges(s)</li><li>▪ Disclosure related to book Closures.</li><li>▪ Results of General Meetings.</li><li>▪ General, Board and Committee meeting attendance Registers.</li><li>▪ Disclosure related to change in composition of Board of Directors, Committees, KMP's.</li><li>▪ Disclosure related to change in details of Auditors of the Company.</li><li>▪ Disclosure related to change in Share transfer Agent.</li><li>▪ Details of Complaints received and correspondence made thereof</li><li>▪ Other event based Disclosures made to Stock Exchange(s).</li><li>▪ Resolution Passed by Circulation in lieu of Board or Committee Meetings.</li><li>▪ Proof of sending and delivery of notice of Board and Committee meeting Registers.</li><li>▪ Proof of sending Annual reports to the Shareholders of the Company.</li></ul>

**Annexure-C**

**Documents hosted on the website to be preserved not less than (5) five years**

Following documents are required to be hosted at the website of the company [www.Nanavatigroup.com](http://www.Nanavatigroup.com) for not less than (5) five years and shall be modified from time to time as decided by the Board of Directors of the Company following the SEBI (LODR) Regulations, 2015, Companies Act, 2013 and all other applicable laws, rules and regulations made under various laws.

<b>S. No</b>	<b>Nature of documents</b>
1.	<ul style="list-style-type: none"><li>▪ Notice of meeting of Board of Directors where Financial Results are being discussed and/or approved.</li><li>▪ Copy of Annual Report.</li><li>▪ Quarterly/Half yearly/Yearly Financial Results of the Company.</li><li>▪ Shareholding Pattern.</li><li>▪ Details of Agreement entered into with media companies and/or their associates etc.</li><li>▪ Schedule of analyst or Institutions Investors meet and Presentations made thereof.</li><li>▪ New name and old name of the Company for continuous period of One year, from the date of the last name change.</li><li>▪ Notices given to Shareholders by advertisement.</li><li>▪ Statement of deviation(s) or Variation (s) given by the Audit Committee regarding the endues of the proceeds of public issue, right issue and preferential issue etc.</li><li>▪ All the information and events required to be disclosed to Stock Exchange(s) under Regulation 30 of the SEBI (LODR) Regulations, 2015/</li></ul>

**BY THE ORDER OF THE BOARD  
FOR INDIAN EXTRACTIONS LIMITED**

**SD/-  
PRIYAM SHANTILAL JHAVERI  
CHAIRMAN & MANAGING DIRECTOR**

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