

VELOX INDUSTRIES LIMITED

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL

1. PREAMBLE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Regulations"] requires every Listed Company to have a policy on Preservation of Documents/ records maintained by the Company either in Physical Mode or Electronic Mode.

2. SCOPE

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. OBJECTIVE OF THE POLICY

The main objective of the policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

The major objectives of the policy are:-

- Identification of the statutory registers and other records of the Company which are required to be preserved.
- Identification and categorization of the statutory registers and other records to be maintained either for eight years or permanently.
- Decide whether the statutory records and documents are to be preserved in physical form or electronic form.
- After completion of 8 years, the statutory documents which are to be preserved for 8 years only may be disposed off as per the guidelines of the Policy or as decided by the Board of Directors at that time.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

4. DEFINITIONS

"Act" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;

"Regulations" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;

“Company”, “This Company”, “The Company”, wherever occur in this policy shall mean “Velox Industries Limited”.

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

“Board of Director” or “Board” means the collective body of the directors of the Company.

“Policy” means “Policy on Preservation of Documents”.

“Registers” means registers maintained under the Companies Act, 2013 or the SEBI Act.

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

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

“Electronic Form” means any contemporaneous device such as computer, laptops, compact disc, floppy disc or any other form of storage or 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.

5. INTERPRETATION

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

6. PRESERVATION PERIOD

The preservation period starts with the conclusion of financial year, in which the document has been formed or the last entry was made; the preservation period of agreements starts with the end of the financial year in which the agreement period expires.

For determining the preservation period, the records are categorized into following two categories:

Category	Description	Period of Preservation
1	As per Annexure A	Documents/Records whose preservation shall be permanent in nature
2	As per Annexure B	Documents/Records to be preserved for a minimum period of Eight Years

Notwithstanding the general guidelines, care should be taken by the respective departments to ensure that records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi judicial for a mediation and alternate dispute for an industrial disputes, etc. are preserved according to specific needs and even beyond the prescribed period.

Also, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc. from Government/ Statutory Bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines/instructions, if any, by the issuing authority.

7. PRESERVATION LOCATION

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved for a proof or other such secure cabinets.

8. MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form.

9. DESTRUCTION OF RECORDS

The records/documents preserved shall be reviewed every year or according to need by the respective department and action taken to destroy those records which are due for disposal.

10. GENERAL AUTHORISATION

The Policy shall be reviewed on a periodic basis and the Chairman and Managing Director / Whole-time Directors and Company Secretary are authorized jointly (by any two) to make such changes as may be deemed necessary or as warranted by law.

11. ARCHIVAL POLICY

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations shall be hosted on the Company's website (www.veloxindustriesltd.in) for a period of 5 years and thereafter will be archived for a period of 1 year.

12. POLICY REVIEW

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements.

13. AMMENDMENT

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

14. In case any of the terms or provisions of this Policy conflict with any law, rule, regulation etc. in force at any time, the law, rule, regulation etc. shall take precedence over the terms and provisions of this Policy.

Annexure - A

Documents / Record whose preservation shall be permanent in nature:

S. No.	Documents / Records
1	Certificate of incorporation
2	Memorandum and Articles of Association
3	Agreements made by the Company with Stock Exchanges, Depositories, etc.
4	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
5	Register and Index of Members, debenture-holders, if any or other security holders, if any
6	Register of Contracts as per Companies Act, 2013
7	Register of Charges as per Companies Act, 2013
8	Register of Investments as per Companies Act, 2013
9	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
10	Such other records as may be required under any law from time to time

Annexure - B

Documents / Record to be preserved for a minimum period of eight years:

S. No.	Documents / Records
1	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2	Annual Returns as per Companies Act, 2013
3	Annual financial statements including: - Annual accounts - Directors report - Auditors report
4	Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013
5	Income Tax Returns & GST Returns filed by the company
6	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
7	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
8	Copy of newspaper advertisement or publications
9	Compliance Reports received from any statutory authority
10	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
11	Disclosure/Return filled under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015