



## Policy on Preservation and archival of Documents

### 1. INTRODUCTION:

The Securities Exchange Board of India (“SEBI”) vide its notification dated September 2, 2015, has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR”) on which is effective from December 1, 2015.

As per Regulation 9 of the SEBI LODR, the Company has adopted a policy namely “Policy on Preservation and Archival of Documents” (“the Policy”). The policy ensures that all the necessary documents and records of the Company are adequately protected, preserved and disposed as required under various statutes, laws, rules, regulations and Company’s Policies for the time being in force.

The Policy embarks obligation on the employees of the Company for retaining and preserving the documents, which are required to be maintained.

### 2. DEFINITIONS:

“**Board**” means the Board of Directors of the Company.

“**Company**” means Dhruva Capital Services Limited.

“**Events**” or “**Information**” refers to the information/ events that are required to disclose on the website of the Company in terms of Regulation 30(8) of the Regulations and other Applicable Law.

“**SEBI LODR**” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (including any amendments thereof).

“**Policy**” means this Policy on preservation and archiving of documents, as amended from time to time.

“**Stock Exchange(s)**” means BSE Limited, where the equity shares of the Company are listed.

“**Preservation**” means to keep in good order; to prevent from being damaged or destroyed.

### 3. SCOPE OF THE POLICY:

The policy is applicable to all Departments and Employees of the Company and governs all the necessary documents and records of the Company to be protected, preserved and disposed as required under various statutes, laws, rules, regulations and Company’s Policies for the time being in force.

### 4. PROVISIONS FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS:

The Company shall maintain and preserve the documents either in physical or electronic mode as permitted by the applicable laws.

The documents of the Company shall be preserved in the following manner:

1. Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, additions or deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved permanently by the Company.



2. Documents whose preservation shall be temporary in nature shall be preserved in the following manner: -
- All such documents for which period of preservation is prescribed under the applicable laws shall be preserved for such period as prescribed under the applicable laws but not less than 8 (Eight) years. –
  - All other documents for which the period of preservation is not prescribed under any laws shall be preserved for a minimum period of 8 (Eight) years or any such specific period as the Company deems necessary.

All departments of the Company shall ensure that the documents pertaining to their department are preserved as per the Policy. It shall be the duty of the departmental heads to ensure that they comply with the requirements of the Policy.

Any violation of this Policy may result in immediate termination of employment or serious action against the Employees including the departmental heads as may be decided by the Board of Directors. Board of Directors at its own discretion may give an opportunity to any employee to represent himself/herself before the Board of Directors.

#### **5. DISPOSAL AND DESTRUCTION OF DOCUMENTS:**

The documents of the Company shall be disposed or destroyed after the period of preservation as prescribed in the Policy or after lapse of such period of preservation as may be prescribed under applicable laws. It shall be the responsibility of the employees of the Company to dispose or destroy the documents pertaining to their departments in the presence of their departmental heads.

A list of the documents destroyed or disposed shall be maintained by each Departmental Heads.

#### **6. AMENDMENTS AND UPDATES:**

Any change in the Policy shall be approved by the Board. The Board shall have the right to withdraw and/or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.