



AIRAN LIMITED
(L74140GJ1995PLC025519)

POLICY ON PRESERVATION OF DOCUMENTS





Preservation of Documents & Archival Policy

Under Regulation 9 and 30(8) Pursuant to SEBI (*Listing Obligations and Disclosure Requirements*) Regulations, 2015 (*Listing Regulations*)

PREFACE

As per Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) all listed entities should have policy for place and preservation of Documents of the company.

This policy attempts to preserve and maintain documents of the organisation. During the course of business, the Company generates several documents either in physical or in electronic mode. Most of the documents are useful for a short span of time and are kept for a definite period, but some documents may be required to be maintained permanently during the lifetime of the organisation. In order to preserve such documents, the Company needs to implement a well-considered, well documented plan to ensure that they remain in good condition over a period of time.

In any circumstances, where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time as this Policy is changed to conform to the law, rule, regulation or standard.

DEFINITIONS

- A. “Act” Means “Companies Act 2013 as amended from time to time.
- B. “Applicable Law” means any laws, rules, circular, guidelines or standard issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India which have prescribed the preservation of the documents.
- C. “Authorised Person” means any person duly authorised by the Board.
- D. “Board of Directors” or “Board” refer to Board of AIRAN LIMITED as constituted from time to time.
- E. “Company” Company shall mean AIRAN LIMITED
- F. “Compliance Officer” means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
- G. “Documents” Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.
- H. “Listing Regulations” Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).
- I. “Electronic Record(s)” means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- J. “Electronic Form” means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and 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.
- K. “Maintenance” means keeping Documents, either physically or in Electronic Form.



- L. "Policy" means policy on Preservation of documents.
- M. "Preservation" is maintenance of documents, files and documents in usable form.
- N. "Key Managerial Personnel" or "KMP" shall have the same meaning ascribed to it under the Act.
- O. "Secretarial Standards" means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.

Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

OBJECTIVE

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- A. The documents of a permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- B. The documents to be maintained and preserved for a 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 years after completion of the relevant transactions subject to the modifications, amendments, additions, 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 for a term not less than eight years. Provided further that the Company may keep the documents as specified above in an electronic mode.

CUSTODY OR RESPONSIBILITIES

- A. Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person.
- B. Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such person shall hand over all the relevant documents, lock and key, access control or password, or Company Disc, other Storage devices or such other Documents and devices in his/her possession under the Policy.
- C. The Board may authorise such other person as it may deem fit as the Authorised Person.
- D. Along with Authorised Person, respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

DESTRUCTION OF RECORDS



After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents.

COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company.

AMENDMENTS TO THE POLICY

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. Shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

A) Companies Act, 2013:

- 1) Memorandum and Articles of Association as amended from time to time
- 2) Register of Contracts
- 3) Register of Directors and KMPs and the securities held by them
- 4) Register of Loans and Investments made by the Company
- 5) Register and Index of Members
- 6) Minutes of the Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots
- 7) Resolutions passed by Circulation
- 8) Various Forms and returns filed with the Authorities
- 9) Audited Financial Statements.

B) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

- 1) Listing Agreement executed with the Exchanges.
- 2) Trading approval relating to listing of securities.
- 3) Offer documents for Public Issues and Private placement of securities filed with Securities and Exchange Board of India.

C) Depositories Act:

- 1) Confirmation of all Corporate Actions in respect of allotment of securities.
- 2) Intimation on allotment of International Securities Identification Numbers (ISIN) for securities issued.

D) Others:

Register of Records and Documents destroyed.

A) Companies Act 1956 / Companies Act, 2013:

- 1) Register of Buy-back of Securities from the date of completion of buy-back
- 2) Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots
- 3) Register of Charges from the date of satisfaction of respective charge
- 4) Register of Debentures and Debenture Trust Deed from the date of its redemption
- 5) Books of Accounts including vouchers and bills
- 6) Annual Returns together with the Annexures



- 7) Register of Transfer and Transmission of shares / Debentures and other securities
- 8) Scrutinizer's Report on Postal Ballot and AGM
- 9) Documents relating to appointment of Managerial Personnel
- 10) Dividend reconciliation statement till the time the dividend is transferred to IEPF

B) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

- 1) All reports filed with the stock exchanges from time to time
- 2) All disclosure of various events and Press Releases
- 3) Intimations of Board Meetings

C) Documents filed with Stock Exchanges under SEBI Regulations:

- 1) All reports filed with the stock exchanges from time to time
- 2) All disclosure of various events and Press Releases
- 3) Intimations of Board Meetings

D) Documents filed with Stock Exchanges under SEBI Regulations:

All disclosures and intimations filed under:

- 1) SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011
- 2) SEBI (Prohibition of Insider Trading) Regulations, 2015
- 3) All disclosures and intimations filed under SEBI (Share Based Employee Benefit) Regulation, 2014 and SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines 1999