



POLICY ON PRESERVATION OF DOCUMENTS

INTRODUCTION

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'Listing Regulations') and Companies Act, 2013.

PURPOSE

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows-

- a) documents whose preservation shall be permanent in nature;
- b) documents with a preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents are required to be preserved permanently or up to a certain prescribed time.

Accordingly, this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

DEFINITIONS

In this Policy, unless the context requires otherwise:

- a) "Act" means the Companies Act, 2013 and the Rules framed thereunder, including any modifications, amendments, clarifications, circulars or re-enactment thereof.
- b) "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.
- c) "Maintenance" means keeping Documents, either physically or in Electronic Form.



M. K. Exim (India) Limited

CIN No.L63040RJ1992PLC007111

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- d) "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- e) "Regulations" shall mean SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015, including any modifications, amendments, clarifications, circulars or re-enactment thereof.

Any other term not defined herein shall have the same meaning as defined under the Companies Act, 2013, the Listing Agreement, Regulations or any other applicable law or regulation to the extent applicable to the Company.

ADMINISTRATION

Documents Preservation Schedule (**Annexure A**) that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode too. The Managing Director, Chief Financial Officer, Compliance Officer, and Head of the Departments who are responsible for relevant areas of the Company's operation (Responsible Officer) shall be in charge of the administration of this Policy and the implementation process and procedures to ensure that the Documents Preservation Schedule is followed. The Administrator is also authorized to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

PROCEDURE FOR DISPOSAL OF DOCUMENTS

The Documents that are no longer required as per the time schedule prescribed may be destroyed. The Responsible Officers may direct the relevant employees from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under Annexure A. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by employees who are disposing of the Documents in the format prescribed at **Annexure B**.

MONITORING & REVIEW

This Policy will be regularly monitored and reviewed to ensure that it remains relevant to the Company's business aims and requirements. Compliance with this Policy and associated procedures will be monitored on an ongoing basis through self-assessment procedures and reviews.



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The continuous monitoring ensures that-

- No illegal records disposal takes place.
- There is a timely review of procedures to ensure that they, the procedures, are relevant, useful and meet the statutory needs.
- Unauthorized access to records is averted.

AMENDMENTS TO THE POLICY

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the policy entirely with the new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

For M.K. Exim (India) Limited

Sd/-

MANISH MURLIDHAR DIALANI

Managing Director



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Annexure 'A' Documents Preservation Schedule

A. Corporate Records

Sr. No.	Document Type	Preservation Period (In Years)
1.	Incorporation documents	Permanent
2.	Common Seal, Certificate of incorporation, Certificate of change of name (if any), Memorandum and Articles of Association as amended from time to time	Permanent
3.	Counter folios of Share Certificates issued from time to time	Permanent
4.	Annual Report, Director's Report, Auditor Report, Secretarial Report and such other reports as required	Permanent
5.	Minutes Books of Board, General Meetings and Committee Meetings	Permanent
6.	Statutory Registers	Permanent
7.	License and Permissions under various Laws	Permanent
8.	Statutory Forms except for routine compliance	Permanent
9.	All documents required under Listing Agreement	Permanent
10.	Register of Members & Index of Members	Permanent
11.	Audited financial statements	Permanent
12.	Orders/judgments issued by Courts/statutory bodies and other background documents relevant for understanding such Orders	Permanent
13.	Material Agreements/Contracts, which, even if terminated, may have an impact on business	Permanent
14.	Investment documents/proofs including certificates, etc.	Permanent
15.	Title deeds and documents pertaining to immovable freehold and leasehold properties Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time	Permanent



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16.	Tax-Exemption, Subsidy documents and related correspondences	Permanent
17.	Vat/ Sales Tax Records, TDS Records, Income tax Papers, Books of accounts	8
18.	Annual Returns	8
19.	Board Agenda and supporting documents	8
20.	Attendance Register of the meeting of the BOD	8
21.	Office copies of Notice of General Meeting and related papers	8
22.	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8
23.	Documents as are required to be maintained under relevant laws relating to direct and indirect tax	8
24.	Non-Statutory Registers/Documents	8
25.	Any other document as may be required to be maintained for eight years in terms of applicable law(s)	8
26.	Register & Index of Debenture-holders, If any	15 years after the redemption of debentures

B. All other documents

All other documents of the Company shall be maintained in compliance with the requirements of the applicable laws.

Annexure 'B'

Sr. No.	Particulars of documents destroyed	Date and mode of destruction	Initials of the Responsible Officer