

VIKALP SECURITIES LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

AS PER REGULATION 9 OF SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015

OBJECTIVE

Pursuant to the Regulation 9 of SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015, every listed entity is required to frame a policy for preservation of documents. So, the Company adopts a policy.

EFFECTIVE DATE

The policy is effective from 1st of December, 2015 in terms of Regulation 9 of Chapter IV of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015.

DEFINITIONS

1. COMPANY

Company here means Vikalp Securities Limited

2. ACT

Companies Act, 2013 including any amendment or modification thereof

3. KEY MANAGERIAL PERSONNEL (KMP)

As defined in Section 2(51) of the Companies Act, 2013

4. SEBI

Securities and Exchange Board Of India

5. LODR

Listing Obligations And Disclosure Requirements

6. BOARD OF DIRECTORS

Board of Directors means Board of Directors of VIKALP SECURITIES LIMITED

7. RULES

The rules made under the Companies Act, 2013

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8. POLICY

Policy means this policy

9. DOCUMENT(S)

All business records of the Company in written, printed and recorded form and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form

10. ELECTRONIC RECORD

The electronic record as defined under clause (t) of sub section (1) of section 2 of the Information Technology Act, 2000.

11. ELECTRONIC FORM

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.

12. PRESERVATION

Maintenance of documents, files and documents in usable form

13. All the words and expressions used here shall, unless defined here, have the meaning respectively assigned to them under the SEBI (LODR) REGULATIONS, 2015, and in case of absence of definition of same, shall have same meaning as defined under the Companies Act, 2013 and the Rules, Notifications and Circulars made/issued there under, as amended from time to time.

POLICY

The Company adopts a policy on preservation of documents of the company in order to identify documents which are required to be preserved permanently and which are required to be preserved temporary for a fixed period of time as per the requirement of the concerned document. This policy provides an indicative list of the documents categorized in two categories i.e. Category A and Category B. In Category A, documents to be preserved permanently have been enlisted and in Category B, documents to be preserved for a period of 8 yrs have been enlisted. Besides that, two more categories have been formed as per this policy. All the four categories have been detailed in this policy at the end.

MODE OF PRESERVATION

The documents may be preserved in

- Physical form or
- Electronic form

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MAINTAINANCE AND PRESERVATION OF DOCUMENTS

Every employee and KMP of the company is responsible for making and keeping the documents as and when required by them. They are responsible for making all efforts to preserve such documents from any damage before the prescribed time limit.

Following guidelines shall be followed:

1. Documents can be preserved either in physical form such as in the form of registers, books and files or in electronic mode such as emails, web pages or database records or scanned documents.
2. Documents shall be kept at the registered office of the Company and cannot be shifted to any other place without complying with the requirements of Act where ever necessary.
3. Documents shall be preserved to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of documents.
4. The concerned departmental heads shall be responsible for the maintenance, preservation and destruction of records pertaining to the respective department.

DISPOSAL OF DOCUMENTS

All documents classified under Category A shall be preserved permanently by the Company, documents classified under Category B shall be preserved for at least 8 years, documents falling under Category C shall be preserved as per the applicable law and documents falling under Category D shall be preserved for such period as the company deems necessary for the purpose of record maintaining and thereafter the documents can be destroyed accordingly.

CATEGORY OF DOCUMENTS

CATEGORY A

Documents to be preserved permanently

INCORPORATION DOCUMENTS
MEMORANDUM OF ASSOCIATION AND ARTICLES OF ASSOCIATION
CERTIFICATE OF CHANGE OF NAME
REGISTER OF CHARGE
REGISTER OF MEMBERS
MINUTES OF MEETINGS
STATUTORY REGISTER MAINTAINED UNDER ACT
LICENSES AND APPROVALS AND REGISTRATION CERTIFICATES RECEIVED FROM VARIOUS STATUTORY AUTHORITIES
AGREEMENTS AND CONTRACTS, LEASE DEEDS
ORDERS ISSUED BY COURTS AND STATUTORY BODIES
POLICIES AND CODES FRAMED UNDER ACT AND SEBI REGULATIONS
ANY OTHER DOCUMENT AS MAY BE REQUIRED TO BE MAINTAINED PERMANENTLY IN TERMS OF APPLICABLE LAW(S)

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CATEGORY B

Documents to be preserved for a period of 8 years

BOOKS OF ACCOUNTS
ANNUAL RETURN
ANNUAL FINANCIAL STATEMENTS
PROXY FORMS, PROXY REGISTERS, ATTENDANCE SLIPS, BALLOT PAPERS, SCRUTINISER'S REPORT, REGISTER AND RECORDS OF POSTAL BALLOT
CONSENTS AND RESIGNATION LETTERS
DECLARATIONS OF INTEREST IN OTHER ENTITIES AND NO DISQUALIFICATION CERTIFICATES, DECLARATION ON COMPLIANCE WITH CODE OF CONDUCT RECEIVED FROM DIRECTORS
INSTRUMENT CREATING CHARGE OR MODIFYING CHARGE FROM DATE OF SATISFACTION OF CHARGE BY COMPANY
NOTICES OF GENERAL MEETINGS, BOARD MEETINGS, AGENDA PAPERS OF BOARD MEETINGS AND OTHER SUPPORTING DOCUMENTS
ADVERTISEMENTS
DIVIDEND REGISTERS AND RECORDS
REGISTER OF INSPECTION
DISCLOSURES MADE UNDER SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015
DISCLOSURES MADE UNDER SEBI (SUBSTANTIAL ACQUISITION OF SHARES AND TAKEOVERS) REGULATIONS, 2011
DISCLOSURES MADE UNDER SEBI(LODR) REGULATIONS, 2015, except those for which specific time period of preservation is prescribed in said regulation
ANY OTHER DOCUMENT AS MAY BE REQUIRED TO BE MAINTAINED PERMANENTLY IN TERMS OF APPLICABLE LAW(S)

CATEGORY C

Documents required to be preserved for a specified period of time as per the applicable law, statute or regulation, then, such document shall be preserved for such period.

CATEGORY D

In case of documents, where there is no such requirement prescribed as per applicable law and which do not also fall under any of the two categories i.e. Category A and Category B, then they shall be preserved for such period as the company deems necessary for the purpose of record maintaining.

AMENDMENT

The code shall be subject to modification as may be deemed necessary and as and when required as per amendment in SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 or in any other applicable law and the Amendment, if made, shall be approved by the Board of Directors of the Company and shall form part of this code.