

KUMAR FOOD INDUSTRIES LIMITED

Policy for Preservation of Documents

[Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

INTRODUCTION

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 have been notified by Securities & Exchange Board of India on September 02, 2015, which shall replace the existing Listing Agreement entered by the Company with the Stock Exchanges on December 01, 2015.

Regulation 9 of the Listing Regulations requires the Board of Directors of listed companies to frame a policy for providing framework for adequate protection and preservation of the documents of the Company as per the applicable statutory requirements.

Accordingly, the Board of Directors of **Kumar Food Industries Limited** has adopted this Policy on its Board which shall be applicable on a Company from the financial year 2016-17.

The Board may amend this Policy from time to time as they may deem fit and/or to incorporate any subsequent amendment(s)/modification(s) in the Listing Regulations with respect to matters covered under this Policy or otherwise.

I. DEFINITIONS

“**Act**” means the Companies Act, 2013 and rules made there under, as amended from time to time.

“**Board of Directors**” or “**Board**” means the Board of Directors of **Kumar Food Industries Limited** as constituted/re-constituted from time to time.

“**Company**” means Kumar Food Industries Limited.

“**Listing Regulations**” means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“**Policy**” or “**this Policy**” means Policy for Preservation of Documents.

“**Stock Exchanges**” means the stock exchanges where the Company’s shares are listed.

“**SEBI**” means Securities & Exchange Board of India.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

OBJECTIVE OF POLICY

This Policy mechanism provides the comprehensive framework for preservation of documents for a specified period of time to achieve the following objectives:

- a) Effective corporate governance and risk management;
- b) Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- c) Systematic disposal/destruction of Company's non-current records that have outlived their administrative usefulness.
- d) Identification of the Company's records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company's Archives.

PURPOSE

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

II. PRESERVATION OF DOCUMENTS

A) Documents as per **Annexure A** and those which are required to be maintained under various Acts/Rules/Regulations applicable to the Company shall be maintained and preserved as per the provisions content therein.

B) The Documents Preservation Schedule is annexed herewith as "**Annexure A**" for the guidance of the concerned departments of the Company.

C) It shall be the responsibility of the concerned head of department to keep the annexed Documents Preservation Schedule updated from time to time to ensure that it is in compliance with the various Acts/Rules/Regulations applicable to their respective Departments and for this purpose, they shall communicate any changes desired in the above mentioned Schedule to the Company Secretary.

D) In case of any inconsistency in the annexed Documents Preservation Schedule and the provisions of various Acts/Rules/Regulations applicable to the Company, such provisions shall prevail.

E) The documents mentioned above can be maintained by the Company in physical or electronic or digital mode, if permitted under the applicable Acts/Rules/Regulations.

F) The concerned head of department shall keep in his custody the documents which are of important and/or confidential nature and list of the same shall be maintained in a list to be kept in his/her custody and he/she shall be responsible for the preservation of the same. The said documents alongwith the list shall be handed over by him/her to the successor in the event of such head of department leaving the Company/Department.

III. DESTRUCTION OF DOCUMENTS

A) After the expiry of the preservation period specified in the annexed Documents Preservation Schedule, such documents which are no longer required may be destroyed by the concerned department after obtaining prior approval of Managing Director or any other person authorized by the Board of the Company. The records of the documents destroyed shall be maintained by the concerned department and shall be produced whenever required by the concerned authority/auditors.

B) In case any specific procedure is prescribed under applicable Act/Rule/Regulation for destruction of the documents, the same shall be followed by the Company.

C) Where the Company has been served with any Notice requisitioning documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed off finally.

IV. ARCHIVAL OF DOCUMENTS

Documents mentioned in the annexed Documents Preservation Schedule which are not required regularly can be archived by the concerned department in the following manner:

1. Documents to be archived should be kept in the storage locations earmarked by the Company for the purpose in secured place or cupboard having access only by the authorized personnel. If consider appropriate, services of external archival agencies may be utilized;

2. Documents should be boxed and the box should be labelled with the reference number and list of the files/documents. List of documents contained in the box should be kept inside the Box and shall also be kept by the concerned department;

3. Documents should be stored in a way that preserves their integrity and readability and restricts access to authorized personnel only;

4. The medium used to store documents shall be such that those documents remain complete and legible throughout the required period of retention and can be made available to the Auditors or Regulatory Authorities upon request;

5. The concerned department head should maintain a record of documents archived, box reference number and storage location; and

6. Electronic records i.e. e-mails, files etc. should be archived as per IT Policy of the Company.

V. DISCLOSURES

The Company shall disclose this Policy on its website and a web link thereto shall be provided in the Annual Report.

INTERPRETATION

In any circumstance 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 these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.

ANNEXURE A

DOCUMENTS PRESERVATION SCHEDULE

• **Corporate Records**

<u>Serial No.</u>	<u>Type Of Document</u>	<u>Preservation Period</u>
1.	<i>Common Seal</i>	<i>Permanent</i>
2.	<i>Certificate of Incorporation, certificate of change in Name, etc.</i>	<i>Permanent</i>
3.	<i>Statutory Registers</i>	<i>Permanent</i>
4.	<i>Resister Of Members</i>	<i>Permanent</i>
5.	<i>Minutes of Meetings</i>	<i>Permanent</i>
6.	<i>Index Of Members</i>	<i>Permanent</i>
7.	<i>MCA Forms</i>	<i>Permanent</i>
8.	<i>Scrutinizers Reports</i>	<i>Permanent</i>
9.	<i>Annual Returns</i>	<i>8 years form the filing with MCA</i>
10.	<i>Attendance Register of Board, Committee and General Meeting</i>	<i>8 years</i>
11.	<i>Office Copies Of Notice Of Board Meeting/Committee/General Meeting; Agenda, Notes on Agenda and other related papers</i>	<i>8years</i>

• **Accounts and Finance**

<u>Serial No.</u>	<u>Type of Document</u>	<u>Preservation Period</u>
1.	<i>Bank Statements</i>	<i>8 years</i>
2.	<i>Investment Records</i>	<i>8 years</i>
3.	<i>Journal Entry support data</i>	<i>8 years</i>
4.	<i>Books of Accounts, Ledgers and Vouchers</i>	<i>8 years</i>
5.	<i>Annual Audit Records and Financial Statements</i>	<i>Permanent</i>

• **Tax Records**

<u>Serial No.</u>	<u>Type of Document</u>	<u>Preservation Period</u>
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1.	<i>Tax exemption and related documents</i>	<i>8 years</i>
2.	<i>Tax Deducted at Source Records</i>	<i>8 years</i>
3.	<i>Income Tax papers</i>	<i>8 years</i>

- **Legal Files and Records**

<u>Serial No.</u>	<u>Type of Document</u>	<u>Preservation Period</u>
1.	<i>Court orders</i>	<i>Permanent</i>
2.	<i>Legal Memoranda and opinion including subject matter files</i>	<i>Permanent</i>
3.	<i>Litigation files</i>	<i>Permanent</i>

- **Property Records**

<u>Serial No.</u>	<u>Type of Document</u>	<u>Preservation Period</u>
1.	<i>Original Property Purchase and Sale Agreement</i>	<i>Permanent</i>
2.	<i>Property Card, Index II, Ownership records issued by Government Authority</i>	<i>Permanent</i>

- **Insurance Records**

<u>Serial No.</u>	<u>Type of Document</u>	<u>Preservation Period</u>
1.	<i>Insurance Policies</i>	<i>8 years</i>

- **Employment/Personnel Record**

<u>Serial No.</u>	<u>Type of Document</u>	<u>Preservation Period</u>
1.	<i>Documents relating to recruitment, employment, personnel information, performance, review, action taken, complaints by or against any employee</i>	<i>8 years</i>

- **Marketing and Sales Records**

<u>Serial No.</u>	<u>Type of Document</u>	<u>Preservation Period</u>
1.	<i>Marketing and Sales Documents</i>	<i>8 years</i>