

PRAKASH PIPES LIMITED

POLICY FOR MAINTENANCE AND PRESERVATION OF DOCUMENTS

1. PREFACE

The Board of Directors (the “Board”) of Prakash Pipes Limited (the “Company”) has adopted the following policy with regard to preservation of Documents at their meeting held on 24th April 2019. This Policy has been formulated in accordance with Regulation 9 of Chapter IV of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015. This Policy shall be known as “Policy for Maintenance and Preservation of Documents”. Further Regulation 30(8) requires the company to frame a policy on website disclosure and archival of such disclosure.

2. PURPOSE OF THE POLICY

The purpose of this Policy is to specify the type of document(s) and time period for preservation thereof based on the classification mentioned under Regulation 9 of Listing Regulations, 2015.

3. TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION

The company shall maintain and preserve documents as specified hereunder:

Category (A): The documents of permanent nature (listed in **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

Category (B): The documents of the company to be maintained and preserved for 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 year after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years.

For the purpose of this policy, document may include the following:

- i. ‘books and papers’ as defined in clause 12 of section 2 of the Companies Act,2013;
- ii. ‘books of accounts’ as defined in clause 13 of section 2 of the Companies Act,2013;
- iii. ‘documents’ as defined in clause 36 of section 2 of the Companies Act,2013;
- iv. ‘registers’ as defined in clause 74 of section 2 of the Companies Act,2013

Further, the company may deeming fit and possible from time to time maintain above mentioned documents in electronic form to the extent possible.

4. AMENDMENT

This policy as may be amended from time to time, shall be made available at the Web site of the Company. Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors 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.

5. MANNER OF PUBLIC DISCLOSURE OF RECORDS PUBLISHED ON THE WEBSITE OF THE COMPANY

The documents required to be published on the website of the Company shall be hosted under the “Corporate Governance” section of the website till the stipulated duration of time as per archival policy of the company or such longer time as per provided under the various laws in force or as the Directors of the Company or the Company secretary so desire.

Annexure 1: Documents whose preservation shall be permanent in nature:

Sl.No.	Nature of Document(s)	Regulation reference
a.	Shareholding Pattern	31(1)(b)
d.	Annual Report	34(1)
c.	Shareholding Pattern in case of Capital Restructuring	31 (1) (c)
e.	Draft Scheme of Arrangement	37(2)
e.	Yearly Disclosure of shareholding of Promoters	30 (2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011
f.	All documents and Information originally filed with ROC for Incorporation of Company	
g.	Memorandum of Association and Articles of Association as originally filed and updated from time to time	
h.	Register of Members	
l.	Index of Members	
j.	Minutes of General Meeting	
k.	Minutes of Board Meeting	
l.	Minutes of various Committee Meetings	
m.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time	

Annexure 2: Documents with preservation period of not less than eight years after completion of the relevant transactions

Sl.No.	Nature of Document(s)	Regulation reference
a.	Statement under Grievance Redressal Mechanism	13(3)
b.	Corporate Governance Report	27(2)(a)
c.	Statement of deviation or variation in use of issue proceeds	32(1)
d.	Compliance Certificate to the exchange about the share related activities maintained by RTA registered with SEBI	7(3)
e.	Compliance Certificate w.r.t. Transfer or transmission or transposition of securities within 30 days	40(10)
f.	Listing Fees	14
g.	Intimation of appointment of Share Transfer Agent	7(5)
h.	In-principle approval prior to issue of securities	28(1)
i.	Prior Intimations of Board Meeting for financial Result	29(1)(a)
j.	Prior Intimations of Board Meeting for Buyback, voluntary delisting etc	29(1)(b),29(1)(c), 29(1)(d),29(1) (e) and 29(1)(f)
k.	Prior Intimations of Board Meeting for alteration in nature of securities	29(3)
l.	Disclosure of Price Sensitive Information	30(6)
m.	Shareholding Pattern prior to listing of securities	31(1)(a)
n.	Record date or Date of closure of transfer books	42(2)
o.	Record date for declaring dividend and /or cash bonus	42(3)
p.	Change in name of listed entity	45(3)
q.	Disclosure of information or events	30
r.	Reconciliation of Share Capital Audit Report	55A of SEBI (Depositories and Participants) Regulations, 1996
s.	Disclosures under Code of Internal Procedures And Conduct For Regulating, Monitoring And Reporting Of Trading By Insiders	10(1)
t.	Quarterly Financial Results	33 (3) (a)
u.	Annual Financial Result	33 (3) (d)
v.	Voting Results by Shareholders	44 (3)
w.	Books of Accounts	
x.	Annual Return(s)	
y.	Register of Debenture holders	
z.	Index of Debenture holders	
za.	Statutory Registers	
zb.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.	