

MARKET CREATORS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

PREAMBLE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [“Regulations”] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

SCOPE

This Policy categorizes the records that will be preserved indefinitely without any time limit and the records that will be preserved for specified period of time and outlines responsibilities to create, maintain and lawfully dispose of the records. It endorses the preservation of records in the Company’s Archives.

DEFINITIONS

“**Company**” means Market Creators Limited.

“**Board**” means the Board of Directors of Market Creators Limited.

“**Listing Regulations**” means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“**Policy**” means this Policy of Preservation of Documents of Market Creators Limited.

“**Records**” in relation to this policy includes accounting records, books or papers and books and papers as defined in sub-section 12 of section 2, books of accounts as defined in sub-section 13 of section 2 of the Companies Act, 2013, statutory and other documents of material significance whether covered under this Policy or not.

OBJECTIVE OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

The major objectives of the policy are:

- Identification of statutory registers and other records of the Company which are required to be preserved.
- Identification and categorization of the statutory registers and other records to be maintained either for eight years or permanently.

- Decide whether the statutory records and documents are to be preserved in physical form or in electronic form.
- After completion of 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per the guidelines of the Policy or as decided by the Board of Directors at that time.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

INTERPRETATION

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

AUTHORITY AND RESPONSIBILITY

The respective Head of Department shall be responsible for the preservation of the records according to the legal rules and regulations concerning the department.

All staff and management of the Company shall assist in implementing this Preservation Policy as appropriate to their roles and responsibilities.

CLASSIFICATION OF RECORDS

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the 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 preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. documents that needs to be preserved and retained permanently;
- b. documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;

- c. documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company.

MODES OF PRESERVATION

The Documents may be preserved in

- a. Physical form; or
- b. Electronic Form.

ACCESS AND AUTHENTICITY

The preservation of the records of the Company is vital in order to ensure all current and future access to the records. Preservation is also concerned with ensuring the authenticity of records.

Since the records are maintained at different levels and departments in the Company, therefore Heads of Department is authorized to ensure the preservation and access to the Records under their department.

DESTRUCTION OF DOCUMENTS

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure A** may be destroyed. The concerned officer may direct employees in charge 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**. The entries in the register shall be authenticated by the Authorized Person.

REVIEW OF THE POLICY

This policy shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments.

Annexure - A
Indicative List

a) Records to be preserved permanently

1. Certificate of Incorporation
2. Certificate of commencement of business
3. Memorandum and Articles of Association
4. Agreements made by the Company with Stock Exchanges, Depositories etc
5. Minute Book
6. Register and Index of Members
7. Compliance Reports received from any statutory authority
8. Forms and returns filed with any statutory authority
9. Authorization / licenses obtained from any statutory authority

b) Records to be preserved for minimum period of eight years

1. Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2. Annual Returns as per Companies Act, 2013
3. Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
4. Income Tax Returns filed under Income Tax Act, 1961
5. Copy of newspaper advertisement or publications
6. All show cause notice or any other notice received from any statutory, government departments, Judicial or Quasi-judicial authority etc.

C) Others

As per applicable law

Annexure – B

Specimen format of the register of documents disposed off / destroyed

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON