

AVONMORE CAPITAL & MANAGEMENT SERVICES LIMITED

PRESERVATION OF DOCUMENTS POLICY

This is Avonmore Capital & Management Services Limited ("ACMS")'s policy for the Preservation of Documents, in hard and electronic media. ACMS reserves the right to revise this Policy at any time.

Preamble:

This policy attempts to preserve and maintain documents of the organisation. During the course of business, the Company generates several documents either in physical or in electronic mode. Most of the documents are useful for a short span of time and are kept for a definite period, but some documents may be required to be maintained permanently during the lifetime of the organisation. In order to preserve such documents, the Company needs to implement a well-considered, well-documented plan to ensure that they remain in good condition over a period of time.

Purpose of the policy:

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical. A good document preservation program is fundamental to the Company's commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents. This policy seeks to ensure that the Company's business is adequately documented that are then managed in accordance with best practice. Preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability.

Scope:

This policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

Definitions:

"Applicable Law" means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed

"Board of Directors" or "Board" means the Board of Directors of Avonmore Capital & Management Services Limited, as constituted from time to time.

"Company" means Avonmore Capital & Management Services Limited

"Documents" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for

the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

“Document Keeping” means making and maintaining complete, accurate and reliable evidence of business transactions in the form of recorded information.

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

“Policy” means policy on Preservation of documents.

“Preservation” is maintenance of documents, files and documents in usable form.

Policy:

a) CREATION OF DOCUMENTS:

All employees of the Company are required to create accurate documents regarding their respective matters. The documents should:

- i. facilitate necessary action by employees and their successors at any level at all points of time;
- ii. facilitate proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;
- iii. protect the financial, legal and other rights of the organisation, its clients and any other people affected by its actions and decisions.

b) MAINTAINENCE OF DOCUMENTS

Every member of the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transactions and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed time limit.

- Electronic documents can be maintained in forms such as emails, web pages or database records, plus scanned versions of papers that have been digitised in business processes.
- Physical documents to be maintained in books and files.

c) DISPOSAL AND DESTRUCTION OF DOCUMENTS

- All documents mentioned in Category A which are temporary in nature must be preserved for a period not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed. However, all documents mentioned in Category B need to be permanently preserved by the Company during its entire life time. Utmost care is to be taken to ensure that files are well preserved.
- The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Department Head for the purpose. Inspection of this register is restricted.

Category A	Category B
<p>The memorandum and articles of the company</p> <p>Affidavit from the subscribers to the memorandum and from persons named as the first directors</p> <p>Register of members</p> <p>Books and Documents relating to the issue of share certificates, including the blank forms of share certificates</p> <p>Annual return</p> <p>Register of charges</p> <p>Minutes of Board and General Meeting</p> <p>Registers of investments in securities not held in the name of the Company</p> <p>Register of charges Permanent</p> <p>Register of investment (other than securities not held in the name of the company)</p> <p>Register of documents executed under common seal</p> <p>Register of records and documents destroyed</p> <p>Register and index of members</p> <p>Register of transfer of shares</p> <p>Register of transmission of shares</p> <p>Register of renewed and duplicate certificates</p> <p>Register of contracts in which directors are interested</p> <p>Register of Directors, Managing Director, Manager and Secretary</p> <p>Register of Directors' share holding</p> <p>Register of inter corporate loans and investments Management Policies and Procedures Current version with revision history</p> <p>Intellectual Property Service marks/trademarks and Copyrights</p>	<p>Books of accounts and registers along with the vouchers</p> <p>Register of allotment</p> <p>Register of payment of dividend</p> <p>Register of Director's attendance</p> <p>Register of proxies</p> <p>Copies of all annual returns, copies of all certificates and documents required to be annexed thereto for a period of 8 years</p> <p>Contracts after termination, Legal correspondence</p> <p>Correspondence with regulators</p> <p>Tax exemption documents & correspondence, Tax returns</p> <p>Correspondence (including emails) and internal memoranda relating to routine matters with no lasting significance and not included in either of the above categories shall be preserved for 12 months</p> <p>Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS2)</p> <p>Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 10 years or as long as they remain current).</p>