

POLICY ON PRESERVATION OF DOCUMENTS

PREAMBLE

Libord Finance Limited (“LFL” or the “Company”), being a listed entity, is obliged to frame a policy for preservation of documents in terms of Regulation 9 of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI-LODR” or “Regulations”) which requires every listed company to have a policy on 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. The listed entity may keep such documents in electronic mode.

Accordingly, this Policy has been framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy contains guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

PURPOSE OF POLICY

The purpose of implementing this Policy is to facilitate efficient operation of our Company as regards to adequate preservation and protection of documents in compliance with the statutory and regulatory requirements applicable from time to time and also to set principles for classifying, managing and storing of records of the Company. Except as stated otherwise in this Policy, all documents shall be preserved: a. Permanently; b. For the period not less than eight (8) years after completion of relevant transaction; c. For the period other than mentioned under (a) and (b) herein above.

SCOPE OF POLICY

All the information and / or documents created and / or received by the employees in the course of their duties on behalf of the Company, preserved in the form of records, are covered by this policy. It is emphasised here that this policy is equally applicable to records created and / or received in electronic format as it is to paper records, which are bound by the legislative requirements.

DEFINITIONS

1. **“Company”** means Libord Finance Limited
2. **“Board”** means the board of directors of the Company or its Committee;
3. **“Documents”** means as defined in sub- section 36 of section 2 of the Companies Act, 2013
4. **“Electronic Records”** means as defined in Information Technology Act, 2000 or as amended from time
5. **“Electronic Form”** means as defined in Information Technology Act, 2000 or as amended from time
6. **“Listing Regulations”** means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015
7. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed
8. **“Policy”** means this Policy of Preservation of Documents of the Company;
9. **“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.

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.

POLICY ON PRESERVATION OF DOCUMENTS

This policy sets the standards for preservation of documents of the company, broadly classified in the following categories, which may be preserved, in physical and/or electronic mode.

CATEGORY A – DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

The Following documents shall be maintained and preserved permanently by the Company. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company

- Certificate of Incorporation
- Memorandum & Articles of Association
- Agreements made by the Company with Stock Exchanges, Depositories, etc.
- Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
- Register of Contracts as per Companies Act, 2013
- Register of Charges as per Companies Act, 2013
- Register of Inter Corporate Loans and Investments as per Companies Act, 2013
- Register of Directors and Key Managerial Personal and its share holding
- Register of preservation and disposal of records
- Register of investments in securities not held in the name of the Company
- Such Other records as may be Required under any law from time to time
- Register of Members
- Index of Members
- Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
- Authorization / licenses obtained from any statutory authority
- Policies of the Company framed under various regulations

CATEGORY B – DOCUMENTS

- Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
- Register of Inter Corporate Loans and Investments as per Companies Act, 2013
- Annual Returns as per Companies Act, 2013
- Register of Deposits as per Companies Act, 2013
- Register of Allotment (from the date of each allotment) as per Companies Act, 2013
- Annual financial statements including:
 - Annual accounts
 - Directors report
 - Auditors report
- Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
- Income Tax Returns filed under Income Tax Act, 1961
- All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
- Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
- Copy of newspaper advertisement or publications
- Records relating to Court Cases / CBI Cases / Police Cases / Civil Suits / Labour Court Cases/ Arbitrations Cases.
- Compliance Reports received from any statutory authority
- Register of power of attorneys, if any
- Forms and returns filed with RBI/MCA or with other statutory authority

RESPONSIBILITY

The Heads of respective Departments of the Company shall be responsible for preservation of the documents in term of this policy, in respect of the areas of operations falling under the charge of each of them

ARCHIVING OF DOCUMENTS ON THE WEBSITE

The Company shall disclose on its website all events or information which has been disclosed to stock exchanges (s) under Regulation 30 of Regulations. Such disclosure shall be retained on the website of the company for a minimum period of five years. At the end of the fifth years the information shall be archived for a further period of three years.

DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the instructions approved by the Board of Directors/ concerned Functional Director / Head of the Department.

This applies both physical and electronic documents

GENERAL

Not with standing anything contained in the policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendments to such laws/regulations or otherwise and applicable to the Company from time to time

EFFECTIVE DATE AND POLICY ENFORCEMENT

The above said Policy is approved by Board of Directors of the Company and is effective from 1st April 2016.

REVIEW OF THE POLICY

The Policy Shall be subjected to review of the board and may be amended as may be deemed necessary and /or in accordance with any regulatory amendments