



MEFCOM CAPITAL MARKETS LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL

1. INTRODUCTION

Mefcom Capital Markets Limited (hereafter referred to as "Mefcom" or "Company" in this document) believes in promoting a fair, transparent, ethical and professional work environment. This Policy aims to preserve Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as "the Documents"). This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

2. PURPOSE OF THE POLICY

Regulation 9 of the Listing Regulations mandates that a 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 a preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time.

Accordingly this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

3. DEFINITIONS

For the purposes of this policy, the following definitions apply:

"Act" means Companies Act, 2013.

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

"Board" means the Board of Directors of the Company



“**Company**” means Mefcom Capital Markets Limited.

“**Managing Director**” as defined under Section 2(54) of Companies Act, 2013 means a Director who, by virtue of the articles of a company or an agreement with the company or a resolution passed in its General Meeting, or by its Board of Directors, is entrusted with substantial powers of management of the affairs of the Company and includes a Director occupying the position of Managing Director.

“**Company Secretary**” as defined under Section 2(24) of Companies Act, 2013 means a Company Secretary as defined in clause (c) of sub-section (1) of Section 2 of the Company Secretaries Act, 1980 who is appointed by a Company to perform the functions of a Company Secretary;

“**Compliance Officer**” means Company Secretary, under these Regulations.

“**Registrar and Share Transfer Agent**” means Beetal Financial and Computer Services Pvt. Limited

“**Document**” means any documentary material approved by Board of Directors in either paper or electronic form, generated or received by the Company including but not limited to electronic document, CD-ROM, hard disk, email, microfilm, x-ray film, video tape, floppy disk, USB memory etc.

“**Register**” means register of various documents maintained by the Company on paper or in electronic form of various documents.

4. POLICY

4.1 PRESERVATION OF DOCUMENTS

(A) **Preservation of Documents with Specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

- 1) The documents whose preservation shall be permanent in nature
 - **All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time to time shall be preserved permanently. (Listed in Annexure-1)**
- 2) Documents with preservation period of not less than eight years after completion of the relevant transactions
 - **All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company for a period of not less than eight years after completion of the relevant transaction shall be preserved accordingly. (Listed in Annexure-2)**
- 3) Documents with preservation period other than those mentioned in 1) and 2) above
 - **All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, and Notifications etc. for a preservation period of other than those mentioned in 1) & 2) above shall be preserved accordingly.**



- 4) Registrar and Share Transfer Agent shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained by them and provide an annual undertaking to the Company in this regard.

4.2 ARCHIVAL

In accordance with the provisions of the aforesaid Regulation, the Company shall ensure that all the information shall be hosted on the Company's website (www.mefcom.in) for a period of 5 years and thereafter will be archived for a period of 2 year.

5. AMENDMENTS TO THE POLICY

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

5. EFFECTIVE DATE

The policy, as approved by the Board of Directors, shall be effective from December 1, 2015

6. DISCLOSURE

Company Secretary and Compliance Officer of the company or any other person authorized by the Board shall be responsible for keeping the safe and proper custody of above said documents and registers at their respective place as prescribed hereinabove.

PERMANENT PRESERVATION OF DOCUMENTS

Pursuant to the requirements of the Act and rules made thereunder, the documents as detailed below shall be preserved permanently by the Company at prescribed place in the custody of the Company Secretary of the Company or any other person authorized by the Board for the respective purpose hereunder:

- i. Register of charges under section 85 of the Act and Rule 10 of the Companies (Registration of Charges) Rules, 2014 maintained in the form of CHG-7 at the Registered Office of the Company.
- ii. Register of loans, guarantee, security and acquisition made by the Company under section 186(9) of the Act and Rule 12(1) of the Companies (Meetings of Board and its Powers) Rules, 2014 to be maintained in the form of MBP-2 at the Registered Office of the Company.
- iii. Register of investments not held in its own name by the Company under section 187(3) of the Act and rule 14(1) of the Companies (Meetings of Board and its Powers) Rules, 2014 to be maintained in the form of MBP-3 at Registered Office of the company.
- iv. Register of contracts and arrangements with related party and Bodies etc. in which directors are interested under section 189(1) of the Act and Rule 16(1) of the Companies (Meetings of Board and its Powers) Rules, 2014 to be maintained in the form of MBP-4 at Registered Office of the Company.
- v. Register of Employee Stock Option under section 62(1)(b) of Companies Act, 2013 read with Rule 12(10)(b) of Companies (Share Capital and Debentures) Rules, 2014 maintained in the form of SH-6 at the Registered Office of the company or such other place as the Board may decide
- vi. Register of Security Buy Back under Section 68 (9) of Companies Act, 2013 read with Rule 17(12) of Companies (Share Capital and Debentures) Rules, 2014 maintained in the form SH-10 at the Registered Office of the Company.
- vii. Register of Loans, Investments, Guarantee or Security under Section 186 of the Act read with Rule 12 of Companies (Meetings of Board and its powers) Rules, 2014 maintained in the form MBP-2 at the Registered Office of the Company.
- viii. Minutes of General Meetings under Rule 25 of the Companies (Management and Administration) Rules at Registered Office of the company or at any other place in India as Board may decide.
- ix. Register of Directors and Key Managerial Personnel including the details of securities held by each of them in the company under Section 170 and Rule 17 of the Companies (Appointment and Qualification of Directors) Rules, 2014 at registered office of the Company.
- x. Register of Members including an index of the names under Section 88 of the Act and Rule 3 and 5, 15 of the Companies (Management and Administration) Rules, 2014 to be maintained in the form of MGT-1 at Registrar and Share Transfer Agent of the Company.
- xi. Register of Renewed and Duplicate Share Certificates under Rule 6(3) of the Companies (Share Capital and Debentures) Rules, 2014 at Registrar and Share Transfer Agent of the Company.
- xii. Register of Transfer and Transmission under Section 56 of Companies Act, 2013 maintained at Registrar and Share Transfer Agent of the Company.
- xiii. Minutes of Board Meetings, Committee Meetings and General Meetings and Resolution passed by Postal Ballot under Rule 25 of the Companies (Management and Administration) Rules at Registered Office of the company.



- xiv. Statutory Clearances, Annual Returns, Assessment Orders, Loan Documents, Security Documents, Guarantee Documents, Investment Documents, EPC Contracts, Management Consultancy Agreements, Stock Exchange Listing Permissions etc.
- xv. Other Statutory Registers and Documents maintained by the Company under various laws applicable to the Company.
- xvi. Any other document as may be prescribed by the Board from time to time.

PRESERVATION OF DOCUMENTS FOR NOT LESS THAN EIGHT YEARS

The documents mentioned below shall be preserved for not less than eight years by the Company at such place in the custody of such person as prescribed hereunder:

- i. Books of Account including relevant books and papers and financial statements for a period of not less than eight financial years of immediately preceding Financial Year under section 128(5) of the Act at Corporate Office of the company.
- ii. Disclosures/ Notices by a director of his interest for a period of eight years from the end of the financial year to which it relates under the Rule 9 of Companies (Meetings of Board and its Powers) Rules, 2014 in the Form of MBP-1 at Registered Office of the Company.
- iii. Register of Deposits for a period of not less than eight years from the financial year in which the latest entry is made in the register under section 73 of the Act and Rule 14 of Companies (Acceptance of Deposits) Rules, 2014 at the Registered Office of the Company.
- iv. The instrument creating a charge or modification preserved for a period of eight years from the date of satisfaction of charge by the Company under Section 85 of the Act and the Companies (Registration of Charges) Rules, 2014 at the Registered Office of the Company.
- v. Annual Return and copies of all certificates and documents required to be annexed thereto for a period of eight years from the date of filing with the Registrar under Section 92 and 94 of the Act and Rule 15 of Companies (Management and Administration) Rules, 2014 at Registered Office of the company.
- vi. Register of Debenture holders, beneficial owners including an index of the names under Section 88 of the Act and Rule 4, 5 and 15 of the Companies (Management and Administration) Rules, 2014 to be maintained in the form of MGT-2 at Registrar and Share Transfer Agent of the Company.
- vii. Any other document as may be prescribed by the Board from time to time.