

POLICY OF PRESERVATION OF DOCUMENTS

Introduction

Clause 9 of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 make it mandatory to have a policy for preservation of documents approved by Board of Directors.

1. Purpose

The Purpose of this policy is to preserve the prescribe documents;

- Permanently; or
- for the period statutorily required or for eight years, whichever is higher.

2. Scope

This policy applies to all documents generated by the employees of the company within the scope of their activities. These documents are not the property of the employee of the company.

3. Definitions

3.1 Document

Within the scope of this policy, *Documents* refers to all the files, documents, memos, plans, photos, media etc. (including digital/soft format) that results from the business activity of the company, particularly to fulfill their tasks and include “books of accounts” and book and/or paper” as defined under the Companies Act, 2013.

3.2 Preservation of documents permanently/unlimited Archiving

Unlimited archiving/Permanent Documents apply whenever such documents are particularly required to be preserved permanently under any prevailing Law.

3.3 The Company

The Company means “Pradhin Limited (Formerly known as Bhagwandas Metals Limited)”

4. Responsibility for preservation of Documents

The heads of respective departments are obliged to ensure the preservation of documents pertaining to their area of responsibilities in accordance with the applicable laws/ regulation in consultation with the head of legal.

5. Preservation of Documents

5.1 Documents with preservation period of eight years or more after completion of relevant transactions

Statutory Retention

The documents which are prescribed to be preserved under applicable laws or regulations shall be preserved for period prescribed under the relevant laws/ regulations or eight years whichever is higher.

5.2 Documents whose preservation shall be permanently in nature/ Unlimited archiving

Documents of high long-term relevance must be professionally prepared and stored to allow the company to enforce its own legal interests and to defend itself effectively against third-party interests in the long term. Such documents are not the property of the employees of the Company. Its destruction or removal from the company is expressly prohibited.

All the documents required to be preserve permanently by any prevailing Law must be stored by keeping the following criteria in mind;

- Lockable (Storage must be preserved in lockable cupboard or room)

- Clean dry walls and floors, no pests.
- No water lines or potential sources of fire. Fire extinguisher or similar effective
- Firefighting equipments must be available
- Good Ventilation to prevent mold
- Storage Capacity on a sufficient number of shelves

5.3 General instruction of preservation of documents

Head of the department shall observe following general instruction for preservation of documents;

- List of documents in excel tables
- Routine checking of preserved documents
- Cleaning of storage
- Safety and security of preserved documents
- Prepare a separate check list for preservation of documents as per the requirement of concerned departments
- Periodic review of check list

6. Destruction of Documents

The preserved documents under clause 5.1 may be destroyed, after the statutory retention period, on the request of the head of concerned department after taking approval from Board of Directors of the Company. Before destruction, the head of concerned department shall prepare a list of documents to be destroyed.

7. Review and Approval

The policy shall be reviewed as and when deemed necessary by the Board of Directors. This policy is approved in the meeting of the Board of Directors of the Company held on 23rd March, 2019.

8. Effective Date

This policy shall be effective from 1st April, 2019.
