

PROVENTUS AGROCOM LTD

Policies on **POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS**

Proventus Agrocom Limited

(Formerly known as Proventus Agrocom Private Limited)

Regd. Address: 515, 5th Floor, 215 Atrium, Wing C, Andheri Kurla Road, Andheri East, Mumbai 400059

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CIN: U74999MH2015PLC269390

INTRODUCTION:

Pursuant to the provisions of Regulation 9 and 30(8) of SEBI of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), Regulation 2015 ('SEBI Listing Regulations'), the Board of Directors of the Company have adopted a **Policy for preservation of documents and archival policy**.

PREAMBLE:

The Board of Directors (the 'Board') of **PROVENTUS AGROCOM LIMITED** (the 'Company') has adopted the following policy and procedures for the purpose of preservation of documents and archival of documents on the website of the Company. The Board may review and amend this policy from time to time.

This Policy is approved by the Board of Directors on 21st March 2023 and will be applicable to the Company effective from 21st March 2023

OBJECTIVE:

The Policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business.

The purpose of this Policy is to facilitate

1. Identification, categorization, maintenance and review of documents/records that are to be retained after completion of the relevant transaction in accordance with the applicable laws and regulations;
2. Decide upon the mode of preservation of documents, whether in physical form or in electronic form;
3. Preservation of the confidentiality and security of records; and
4. Systematic and nonselective disposition of records no longer required.

CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED:

The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:

- A. Documents whose preservation shall be permanent in nature;
- B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions;
- C. Documents whose preservation shall be for a minimum period of three years after completion of the event.

The details of documents for the above three categories are given in the Annexure.

ROLES & RESPONSIBILITIES:

The respective Functional/ Departmental heads of the Company shall be responsible for identification, maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them.

SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS:

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In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

WEB ARCHIVAL POLICY:

The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s) in accordance with Regulation 30 of the SEBI Listing Regulations.

Such disclosures shall be retained on the website of the Company for a minimum period of five years.

At the end of the fifth year, the information shall be archived and preserved for a further period of three years.

ANNEXURE

A. Documents whose preservation shall be permanent in nature:

1. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks
2. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records
3. Personal files of all live employees
4. Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.

B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions:

1. Books of Account, Bank Statements and vouchers
2. Filings with Stock Exchanges, Registrar of Companies and other statutory authorities.
3. Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retiral related Records, etc.
4. Corporate Social Responsibility Records
5. Sponsorship Projects Records
6. Correspondence and Internal Memoranda
7. Any other record as may be decided by the Chief Executive Officer of the Company from time to time.

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C. Documents whose preservation shall be for a minimum period of three years after completion of the event:

1. Tender Documents
2. Lease Deeds and Contracts
3. Legal files
4. Insurance Records including policies and claims
5. All e-mail correspondence, internal & external
6. Any other record as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director of the Company from time to time.