

POLICY FOR PRESERVATION OF DOCUMENTS

PREAMBLE

The Securities and Exchange Board of India (Listing Obligations And Disclosure Requirements) Regulations, 2015 were notified on 2nd September, 2015 requiring the Board of Directors of the Company to frame a Policy For Preservation Of Documents.

Regulation 9 required the Board of Directors of the Company to 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; and
- (b) documents with preservation period of not less than eight years

During the course of Business the Company generates enormous documents either in physical or electronic mode out of which some are of utmost importance and is to be referred at any time during the life of the Company; however there are other documents which are to be referred only for a specified period or till the completion of an assignment. In order to have a clear distinction between the documents to be preserved permanently and for a specific period there has to be a policy to preserve the documents. It is also necessary to have such a policy in place to access the records without putting timeless efforts to retrieve the required documents at ease.

Accordingly the Board of Directors of GeeCee Ventures Limited (the “Company”) has adopted this Policy for preservation of documents.

SCOPE AND APPLICABILITY

This Policy is applicable to all the Documents maintained in physical and electronic mode in the Company. The executives responsible to handle the respective work will be accountable to preserve the documents as are generated while performing the work.

The Documents not covered under this policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained. ***The Policy shall be effective from 20.01.2016.***

****Amended w.e.f 23rd May, 2018***

CUSTODY OF THE DOCUMENTS

*The Chief Financial Officer shall be responsible for maintaining and preserving documents at the Head Office and at the Site Offices respectively. In case of resignation or transfer of the above mentioned persons, such person shall hand over all the relevant Documents, lock and key, access control or password, or other storage devices or such other Documents and devices in his possession to other persons as may be identified by the Board of Directors.

**Authority changed w.e.f 23rd May, 2018*

FORM OF MAINTAINING DOCUMENTS

Unless specifically provided in any law or regulation the Company shall at its discretion maintain the Documents in Physical or Electronic mode depending upon the significance of the Document. Further the Company may convert the physical documents in electronic mode to ensure ease in maintenance of records and efficient utilization of space.

DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period the preserved documents may be destroyed in such mode as found to be appropriate by the authorised person. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/ irrelevant. This will apply to both physical and electronic Documents.

DOCUMENTS

For the purpose of this policy the term “Documents” shall mean papers, notes, agreements, notices, advertisement, requisitions, order, 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, the time being in or otherwise,

maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

DOCUMENTS TO BE PRESERVED PERMANENTLY

1. **Companies Act, 2013:**

- Memorandum and Articles of Association as amended from time to time.
- Register of Contracts with related party and contracts and Bodies etc. in which directors are interested.
- Register of Directors and KMPs and the securities held by them.
- Register of Loans, guarantee, security and acquisition made by the Company.
- Register and Index of Members.
- Foreign Register of Members. If any.
- Register of Renewed and duplicate share certificates.
- Minutes of the Board, Committees of the Board and General Body Meetings including meeting conducted through Postal Ballots.
- Resolutions passed by Circulation.
- Various Forms and returns filed with the Authorities.
- Audited Financial Statements.

2. **Sebi (Listing Obligations And Disclosure Requirements) Regulations, 2015 :**

- Listing Agreement executed with the Exchanges.
- Approvals received from the Exchanges.
- Offer Documents for Public Issues and Private Placement of Securities filed with Securities and Exchange Board of India.

3. **Depositories Act:**

- Confirmation of all Corporate Actions in respect of allotment of securities.
- Intimation on allotment of International Securities Identification Numbers (ISIN) for securities issued.

4. **Others:**

- Registers of Records and Documents Destroyed.

DOCUMENTS TO BE PRESERVED AND MAINTAINED FOR A PERIOD OF 8 YEARS FROM THE DATE OF ITS EVENT, UNLESS SPECIFIED UNDER ANY ACT OR RULES, FOR A LONGER DURATION :

1. **Companies Act, 2013:**

- Register of Buy -Back of Securities from the date of completion of buy-back.
- Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and Various Committee Meetings. Register of Charges.
- Register of Debentures and Debenture Trust Deed from the date of its redemption.
- Books of Accounts including vouchers and bills.
- Annual Returns together with Annexures.
- Register of Transfer/ Transmission of Shares / Debentures and other securities.
- Scrutinizer's Report on Postal Ballot and AGM.
- Documents relating to appointment of Managerial Personnel.
- Dividend reconciliation statement till the time the dividend is transferred to IEPF.
- Disclosure of Interest received from the Directors of the Company in the manner prescribed.
- Instrument creating a Charge or modifying Charge, if any. Tax Records – Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for Appeal, as the case may be.
- Employment / Personnel Record in case of employees of the Company.
- Legal documents including but not limited to Contracts, Legal opinions, pleadings, Order passed by any court or tribunal, Judgements, Interim Orders, Documents relating

to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters.

2. Sebi (Listing Obligations And Disclosure Requirements) Regulations, 2015 :

- All reports filed with the stock exchanges from time to time.
- All disclosures of various events and Press Releases.
- Intimations and Outcomes of Board Meetings.
- Proceedings and Results of the General Meetings.

3. Documents filed with Stock Exchanges under SEBI Regulations other than LODR Regulations 2015:

- All intimations and disclosures filed under :
 - SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.
 - SEBI (Prohibition of Insider Trading) Regulations, 2015
 - All disclosures and intimations filed under SEBI (Share Based Employee Benefit) Regulations, 2014 and SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines 1999.

REVIEW AND AMENDMENTS TO THE POLICY

The Policy is subject to review, if necessary by the Board and to make such amendments / alterations as applicable with regard to maintenance and preservation of documents in consonance with the applicable laws, and acts.