

EKAM LEASING AND FINANCE CO. LIMITED

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POLICY ON PRESERVATION OF DOCUMENTS (In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

1. PREFACE

The Board of Directors of Ekam Leasing and Finance Co. Limited (“the Company”) has adopted the Policy for Preservation of Documents (“the Policy”) to comply with the requirements of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) and will be effective from December 01, 2015.

2. DEFINITIONS

- i. “Board of Directors” or “Board”**
Board of Directors or Board shall mean the Board of Directors of Ekam Leasing and Finance Co. Limited, as constituted from time to time.
- ii. “Company”**
Company shall mean “Ekam Leasing and Finance Co. Limited”.
- iii. “Documents”**
Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.
- iv. “Listing Regulations”**
Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

3. PURPOSE OF THE POLICY

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 specified that the listed entity shall have a Policy for preservation of documents, classifying them in at least two categories as follows:

- A Documents whose preservation shall be permanent in nature (listed in **Annexure**) subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- B. Documents with preservation period of not less than eight years after completion of the relevant transactions (listed in **Annexure-2**) subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

Further, Section 94 of the Companies Act, 2013 read with Rules 14, 15 and 16 of the Companies (Management and Administration) Rules, 2014 specifies the place of keeping and inspection of registers, returns, etc.

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

5. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/ unimportant/ irrelevant.

This applies to both Physical and Electronic Documents.

6. GENERAL

Notwithstanding anything contained in this 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 amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

7. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

S. No.	Nature of Documents
1	Register of Members along with Index
2	Register of Directors and Key Managerial Personnel and their Shareholding
3	Register of Investment made by a Company held not in its name
4	Register of Contract or Arrangements in which Directors are interested
5	Registration Certificates
6	Licenses & Statutory Approvals
7	Minutes of Board and General Meeting including Committee Meeting
8	Audited financial statements
9	Material Agreements/Contracts
10	Orders issued by Courts/Statutory bodies
11	Investment Documents/proofs including certificates etc.
12	Any other register/ record/ document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

ANNEXURE 2**DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS**

S. No.	Nature of Documents
1	Books of Accounts
2	Annual Return(s) prepared under Section 92 and Copies of all certificates and documents required to be annexed thereto.
3	Personnel Documents
4	Insurance Policies/ Claims under various policies
5	Correspondences with Departments/shareholders
6	Non-Statutory Registers/Documents
7	Films, Videos, CDs, DVDs, tapes etc.
8	Any other register/records which may be prescribed under applicable laws from time to time