

**POLICY ON**  
**PRESERVATION OF**  
**DOCUMENTS OF**  
**HYREFOX CONSULTANTS**  
**LIMITED**



#### **PREAMBLE:**

Pursuant to Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [*“LODR Regulations”*] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

#### **SCOPE:**

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

#### **OBJECTIVE OF THE POLICY:**

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same. The major objectives of the policy are:

- a. To identify statutory records to be preserved.
- b. To identify records to be maintained either for a period of eight years or permanently.
- c. To decide the mode of preserving the documents, whether in physical form or in electronic form.
- d. To decide the procedure to destroy the documents after eight years or other applicable period,
- e. To help employees understanding their obligations in retaining and preserving the documents and records.

#### **DEFINITIONS:**

“Act” means the Companies Act, 2013 and Rules framed thereunder and any amendments thereto.

“Board of Directors” or “Board” means the collective body of the Directors of the Company.

“Company”, “This Company”, “the Company”, wherever occur in the policy shall mean HyreFox Consultants Limited

“Current” means running matter or whatever is at present in course of passage.

“Electronic Form” means any contemporaneous electronic device such as computer, laptop, compact disc, Floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

“Maintenance” means keeping documents, either physically or in electronic form.

“Policy” or “This Policy” means, “Policy on Preservation of Documents”.



**“Preservation”** means to keep the documents preventing them from being altered, damaged or destroyed.

**“Register”** means a register maintained under the Companies Act, 2013 or the SEBI Act.

**“Regulations”** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

#### **INTERPRETATION:**

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and / or LODR Regulations.

#### **GUIDELINES:**

Regulation 9 of LODR Regulations, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors (“BOD”), classifying them in at least (2) two categories as follows –

- a. Documents whose preservation shall be permanent in nature;
- b. Documents with preservation period of not less than (8) eight years after completion of the relevant transactions.

Accordingly, the Company has classified the preservation of documents to be done in the following manner:

- a. Documents that need to be preserved and retained permanently;
- b. Documents that need to be preserved and retained for a period of **8 years** as specified under the Companies Act, 2013 or Regulations;
- c. Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- d. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is **“Current”**.

An indicative list of the documents and the time-frame of their preservation is provided in **Annexure – A and Annexure - B**.

#### **MODES OF PRESERVATION:**

The Documents may be preserved in

- a) Physical form; or
- b) Electronic Form

The official of the Company who is required to preserve the document shall be Authorized Person who is generally expected to observe the compliance of statutory requirements as per applicable law.



The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents. The preserved documents must be accessible at all reasonable times.

Access may be controlled by the concerned Authorized Person with preservation, so as to ensure integrity of the Documents and to prohibit unauthorized access.

**Destruction of Documents:**

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both physical and electronic documents. The documents may be destroyed as follows:

- a. Recycle Non confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records
- c. Delete or destroy electronically stored data.

**POLICY REVIEW:**

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

**AMENDMENT:**

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.

HyreFox Consultants Limited

*Navaldeep*  
Director/Authorised Signatory



**ANNEXURE – A**

**INDICATIVE LIST**

**RECORDS TO BE PRESERVED PERMANENTLY:**

<b>SR NO.</b>	<b>DOCUMENT/RECORDS</b>
1.	Certificate of Incorporation/ Commencement of Business
2.	Memorandum & Articles of Association
3.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
4.	License and Permissions
5.	Register of Members
6.	Index of Members
7.	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suits/ Labour Court Cases/ Arbitration Cases
8.	Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register
9.	Property records including purchase and sale deeds, licences, copyrights, patents & trademarks shall also be preserved permanently.
10.	Authorization / licenses obtained from any statutory authority
11.	Policies of the Company framed under various regulations
12.	Register of Inter Corporate Loans and Investments as per Companies Act, 2013
13.	Register of preservation and disposal of records
14.	Register of Power of attorneys, if any
15.	Certificates obtained from various statutory authorities
16.	Any other documents as may be applicable under any law, rules or regulation
17.	Agreements made by the Company with Stock Exchanges, Depositories, etc

**ANNEXURE – B**

**RECORDS TO BE PRESERVED FOR MINIMUM PERIOD OF EIGHT YEARS**

<b>SR NO.</b>	<b>DOCUMENT/RECORDS</b>
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Annual Returns as per Companies Act, 2013
3.	Register of Deposits as per Companies Act, 2013
4.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
5.	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
6.	Income Tax Returns filed under Income Tax Act, 1961
7.	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
8.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
9.	Copy of newspaper advertisement or publications
10.	All agreement entered into by the Company from the date of its termination



<b>11.</b>	All show cause notice or any other notice received from any statutory, government departments, Judicial or Quasi-judicial authority etc.
<b>12.</b>	Any other documents as may be applicable under any law, rules or regulation
<b>13.</b>	Books of accounts including Vouchers I Voucher register as defined under the Companies Act
<b>14.</b>	Compliance Reports received from any statutory authority
<b>15.</b>	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
<b>16.</b>	Disclosure/Return filed under SEBI LODR Regulations
<b>17.</b>	Attendance Registers and Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers
<b>18.</b>	Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM).
<b>19.</b>	Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion of the relevant transaction under the Companies Act and/or the SEBI LODR Regulations
<b>20.</b>	Annual financial statements including: <ul style="list-style-type: none"> <li>➤ Annual accounts</li> <li>➤ Director's report</li> <li>➤ Auditors report</li> </ul>

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