

Document Preservation and Archival Policy

of
PREMIER CRYOGENICS LIMITED

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1. Preface

This Policy for Preservation and Archival of Documents of Premier Cryogenics Limited has been framed in terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. The Regulation mandate listed entities to formulate a policy for preservation and archival of documents and to classify the documents into categories for their preservation in physical and/or electronic mode.

2. Objective

In accordance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the objective of this policy is to classify the documents of the Company, for determining their preservation period, into the following categories:

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

3. Scope

The policy shall be a guide for determining the preservation period for commercial and legal documented records and for the retention and retrieval of documents in accordance with the needs of the company, the statutory and other legal requirements including the various aspects of disposal/ destruction of the documents and will be applicable to all locations of the Company.

4. Definition

- (1) “Act” means the Companies Act, 2013 and Rules framed thereunder, as amended from time to time.
- (2) “SEBI Regulations” shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.
- (3) “Company” means Premier Cryogenics Limited
- (4) “Document” includes certificate, license, statutory reports, policies, financial statement, agreement, summons, notice, requisition, order, declaration, form, minutes, returns and registers whether issued, sent or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained in physical or in electronic form.
- (5) “Board” or “Board of Directors” shall mean the Board of Directors of the Company, as may be reconstituted from time to time.
- (6) “Electronic Form” with reference to information shall mean any information generated, set, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.
- (7) “Financial Year” shall have the same meaning ascribed to it under the Act.

Note: Words and expressions used in this policy and not defined herein but defined in the Companies Act, 2013 or the SEBI Regulations shall, unless the context otherwise requires, have the same meaning assigned therein.

5. Categories of Documents to be Preserved

The documents of the Company to be preserved have been broadly classified, for determining their preservation period, into the following categories:

(A) Documents whose preservation shall be permanent in nature

The following documents, including all modifications, amendments, additions, deletions thereto, shall be maintained and preserved permanently by the Company:

- (a) Annual Reports, including the Boards' and Auditor's reports and the financial statements of the Company;
- (b) Minutes of meetings of the Board and its Committees;
- (c) Minutes of General meetings (including Annual General Meetings);
- (d) Records/documents which will have a permanent value for the company even after expiry of their legal preservation period;
- (e) Any other document, certificates, statutory registers that may be required to be preserved permanently in terms of the Act, the SEBI Regulations and/or any other law for the time being in force.

(B) Documents to be preserved for not less than eight years after completion of the relevant transactions

The following documents, including all modifications, amendments, additions, deletions thereto, shall be maintained and preserved by the Company for a period not less than eight years after completion of the relevant transactions:

- (a) Annual Returns, including certificates and documents annexed thereto as per the Act;
- (b) Documents/information submitted to the Registrar of Companies / Ministry of Corporate Affairs in compliance with the Act;
- (c) Documents/information furnished to the Stock Exchanges including information submitted in compliance with the SEBI Regulations;
- (d) The Books of Accounts of the Company;
- (e) Copy of Notices, agenda, agenda notes and related papers and the attendance records of the Board and its Committee meetings;
- (f) Copy of Notices, explanatory statements and related papers, the attendance records and Scrutinizers report regarding General meetings (including AGMs);
- (g) Any other documents/ records that may be required to be maintained and preserved for not less than eight years after completion of the relevant transactions under the Act, the SEBI Regulations and/or any other law for the time being in force.

Notwithstanding the above, the records/documents which are required to be statutorily maintained and preserved for a prescribed period; and those which need to be preserved for a particular period for Company's own reference needs, be preserved for such period or the period specified in the category appropriate to the document, whichever is longer.

In case of statutory documents such as certificates, licenses, sanctions, approvals, etc. from the Government or Statutory bodies, care should be taken to maintain and preserve the documents as per the guidelines/ instructions, if any, by the issuing authority or the period specified in the category appropriate to the document, whichever is longer.

In addition to the above, documents having contractual/legal implication or which are required for adducing evidence in judicial or quasi judicial or other dispute redressal forum shall be maintained and preserved till the time the matter is finally disposed of or for the period specified in the category appropriate to the document, whichever is longer.

6. Commencement of preservation period

The preservation period starts from the conclusion of the financial year in which the document has been formed or the last entry was made.

Provided that the preservation period of agreements starts with the end of the financial year in which the agreement period expires.

7. Responsibility and Location for Preservation

The Heads of respective Departments of the Company shall be responsible for the maintenance, preservation and destruction of the records/ documents pertaining to the concerned department, in terms of the policy, in respect of the areas of operations falling under the charge of each of them.

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept for reference and retrieval purpose in the respective department.

8. Mode of Preservation

The records/ documents may be preserved either physically or in electronic form or both in physical and electronic form.

9. Destruction of Records

The records/ documents preserved shall be reviewed every year or according to need by the respective department and shall ascertain those records which are due for disposal. After the expiry of the retention period, the preserved documents may be destroyed in such mode as may be approved by the Managing Director of the Company or the Head of the concerned Department as may be authorized by the Managing Director.

10. Policy Review

This policy may be reviewed and modified from time to time, as may be deemed necessary or as required by law, subject to approval of the Board.
