

Preservation of Documents and Archival Policy

Pan India Corporation Limited

CIN: L72200DL1984PLC017510

711, 7th Floor, New Delhi House 27

Barakhamba Road, New Delhi – 110001

Website- www.panindiacorp.com



Preservation of Document and Archival Policy

Legal Framework

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligations and disclosure requirements on all the listed entities:-

- a) one of the common obligation for all the listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents, which should be classify in at least two categories as per the said regulation and
- b) Another obligation for all the listed entities pursuant to Regulation 30(8) is to frame "Archival Policy" for all disclosures of events/information to the Stock Exchanges in terms of the said Regulation.

Effective Date

This Policy as approved by the board of directors of the Company will be applicable from 1st December, 2015.

Purpose

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are preserved as per the statutory requirements and also to archive material events/information which was disclosed by the company to the stock exchange prior to the period of five years in terms of Regulation 30.

This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in at least two following categories as follows:

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

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

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Definitions

“Board” means the Board of directors of the Company or its Committee.

“Company” means PAN INDIA CORPORATION LIMITED.

“Document(s)” refers to papers, notes, agreements, notices, advertisements, requisitions, orders, 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, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

“Electronic Mode” includes “electronic form” as defined in clause (r) of sub-section (1) of section 2 of Information Technology Act, 2000 (21 of 2000) and also includes an electronic record as defined in clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000 (21 of 2000)

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

“Regulations” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

Classification and Modes of Preservation

The preservation of document shall be done in the following manner:-

- a) Permanently i.e. Where preservation of documents is permanent in nature as per the Applicable law subject to the modifications, amendments, addition, deletion or any change made therein from time to time; (Illustrative List is attached as Annexure 1)
- b) Specific time period i.e. where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law and
- c) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter with reference to any ongoing litigation, proceedings, complaint, dispute, any direction/order given by statutory authority, contract or any like matter.
- d) In case of any other document for such period, as the officer of the company require to handle or deal with the document.

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Further, Company may keep the documents as specified above in an electronic mode.

Archival Policy

Any disclosure of events or information which have been submitted by the company to the stock exchange under Regulation 30 of the Listing Regulation will be available on the website of the company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the company for a period of 3 years.

Dissemination of the Policy

Copy of this policy as approved by board of directors of the company shall be posted on the website of the company.

Amendment

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.


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Annexure 1

LIST OF DOCUMENTS TO BE PRESERVED PERMANENTLY

S.No.	DOCUMENTS
1	Certificate of incorporation
2	Certificate for commencement of business
3	Memorandum of Association and Articles of the Company
4	Minutes book of board meeting, general meeting and various committee meetings
5	Register and Index of Members, debenture-holders, if any or other security holders, if any
6	Register of Contracts or arrangements in which directors are interested (including Key Managerial Personnel) under Companies Act, 2013
7	Register of Charges under Companies Act, 2013
8	Register of Loans and guarantees given, securities provided and acquisitions of securities
9	Registers of investments in securities not held in the name of the Company under Companies Act, 2013
10	Register of renewed and duplicate share certificates.
11	All documents and Information originally filed with ROC for Incorporation of Company
12	All the licenses, registrations, approvals received by the Company under the applicable Rules, Regulations & Statutes
13	Service marks/trademarks/Copyrights and other IPR Registrations
14	Orders issued by Courts/Statutory bodies
15	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

For PAN INDIA CORPORATION LTD

Director/Auth Sign