

KN AGRI RESOURCES LIMITED 'POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY'

1. PREFACE:

This policy has been framed pursuant to Regulation 9 and Regulation 30 of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015. The Policy shall be applicable for preservation of documents / records maintained by the Company as per the respective statutory / non statutory requirements either in physical mode or in electronic mode.

2. OBJECTIVE:

This policy sets out the standards to classify the documents, records, and registers of the Company into two categories, namely:

- Documents to be preserved permanently. (Annexure-A)
- Documents to be preserved for a specific period of time. (Annexure-B)

3. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of Documents, as per their respective areas of operations.

4. CUSTODY

Subject to the applicable law, the custody of the Documents shall be with the authorized person. Where the authorized Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, access control or password, or Disc, other storage devices or such other Documents and devices in his possession to the relevant person in the organization.

5. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under the 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 shall be applied to both Physical and Electronic Documents.

6. ARCHIVAL OF INFORMATION

Any disclosure of events or information which have been submitted by the Company to the Stock Exchange(s) under Regulation 30 of the SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015, and as per the Materiality Policy of the Company, shall be simultaneously published in the website of the Company and will be available on the website for a period of five years from the date of its disclosure.

The disclosed information aged over and above five years, will be archived from the website of the Company in the manner as the Board may seem necessary.



7. SCOPE & LIMITATION

In any circumstance where the terms of this policy differ from the provisions of any existing or newly enacted law/ Rules / Regulation / Standard governing the Company, the provisions of latter shall take precedence over this policy until such time such policy is changed to conform to such law / Rule / Regulation / Standard.

8. AMENDMENT

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

9. DISSEMINATION

This Policy shall be disclosed as may be required under the provisions of Companies Act, 2013, and the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, subject to applicability from time to time.

10. EFFECTIVE DATE

This Policy shall come into force with effect from 10.12.2021.

* * * * * * * *



'ANNEXURE - A'

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE, UNLESS STIPULATED OTHERWISE UNDER ANY LAW FOR THE TIME BEING IN FORCE :

I. COMPANIES ACT, 2013:

- Memorandum and Articles of Association of the Company as amended from time to time.
- Incorporation related Documents of the Company, including the Incorporation Certificate granted by Registrar of Companies from time to time.
- Minutes of the Board meetings, Committee meetings, and General meetings.
- Register of Charges
- Register and index of Members.
- Register of transfer and transmission
- Register of renewed and duplicate Share Certificates.
- Register of Directors, KMP, and their shareholding under section 170.
- Register of Loan / Guarantee / Security / Investment under section 186.
- Register of Investments by the Company not held in its own name under section 187.
- Register of Contracts / Arrangements under section 189.

II. OTHERS:

- Listing Agreement executed with the exchange(s).
- Agreement with the Registrar & Share Transfer Agent.
- Agreement with the Depositories.
- Offer Document(s) filed with Securities & Exchange Board of India.
- Register of Records & Documents destroyed.



'ANNEXURE - B'

DOCUMENTS WITH THE PRESERVATION PERIOD OF NOT LESS THAN 8 YEARS AFTER THE COMPLETION OF RELEVANT TRANSACTIONS, UNLESS STIPULATED OTHERWISE UNDER ANY LAW FOR THE TIME BEING IN FORCE:

I. COMPANIES ACT, 2013:

- Books of Accounts
- Annual Returns along with documents annexed thereto.
- Details / Statement of unclaimed dividend.
- Instrument creating Charge or modification thereon.
- Documents relating to appointment of managerial personnel.
- Register and index of Debenture-holder / other security holder.
- Register of Deposits
- Register of Proxies
- Disclosure of interest by Directors under section 184.
- Attendance Registers of Board and Committee meetings as per Secretarial Standards.
- Office copies of Notice, Agenda, Notes to Agenda, for the Board meetings, Committee meetings, as per Secretarial Standards.
- Office copies of Notice, Agenda, Notes to Agenda, for the General meetings as per Secretarial Standards.
- Scrutinizer Report

II. OTHERS:

- Intimations / Disclosures made to Stock Exchange(s), under SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015.
- Intimations / Disclosures under SEBI (Prohibition of Insider Trading) Regulations, 2015.
- Intimations / Disclosures under SEBI (Substantial Acquisition of Shares & Takeover) Regulations, 2011
- Intimations / Disclosures made to Stock Exchange(s) pursuant to any other Act, Rules, Regulations, Circulars, guidelines as may be applicable from time to time.