



EVEREST ORGANICS LIMITED

POLICY ON

**PRESERVATION OF DOCUMENTS & RECORDS /
ARCHIVAL POLICY ON WEBSITE DISCLOSURE**

EVEREST ORGANICS LIMITED
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1. 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, 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.

The Board of Directors of Everest Organics Limited (the “Company”) is obliged to formulate a policy for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

This Policy will be applicable to the Company effective 1 December, 2015.

2. Definitions

1. “Board”

Board means “ Board of Directors of Everest Organics Limited”.

2. “Company”

Company means “Everest Organics Limited”

3. “Documents”

Documents means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.

4. “Listing Regulations”

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

3. Objectivity

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 as well as physical in hard copies.

4. Provision with regard to Preservation of Documents under various Laws

The Company from time to time establishes retention or destruction of policies or documents or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property and cost management. Several categories of documents that bear special consideration are identified below. While minimum retention periods are suggested, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

4.1 Documents whose preservation shall be permanent:

The following documents shall be preserved on permanent basis:

Sl. No.	Name of the Document	Regulation Reference
a)	Shareholding Pattern	31 (1) (b)
b)	Quarterly Financial Results	33 (3) (a)
c)	Annual Financial Results	33 (3) (d)
d)	Annual Report	34 (1)
e)	Shareholding Pattern in case of Capital Restructuring	31 (1) (c)
f)	Voting Results by Shareholders	44 (3)
g)	Draft Scheme of Arrangement	37 (2)
h)	Yearly Disclosure of shareholding of Promoters	30 (2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011



4.2 Preservation of Documents for 8 years:

The following Documents shall be preserved for 8 years:

Sl. No.	Name of the Document	Regulation Reference
a	Statement under Grievance Redressal Mechanism	13(3)
b	Corporate Governance Report	27(2)(a)
c	Statement of deviation or variation in use of issue proceeds	32(1)
d	Compliance Certificate to the exchange about the share related activities maintained by RTA registered with SEBI	7(3)
e	Compliance Certificate w.r.t. Transfer or transmission or transposition of securities within 30 days	40(10)
f	Listing Fees	14
g	Intimation of appointment of Share Transfer Agent	7(5)
h	In-principle approval prior to issue of securities	28(1)
i	Prior Intimations of Board Meeting for financial Result	29(1)(a)
j	Prior Intimations of Board Meeting for Buyback, voluntary delisting etc	29(1)(b), 29(1) (c), 29(1)(d), 29(1) (e) and 29(1) (f)
k	Prior Intimations of Board Meeting for alteration in nature of Securities	29(3)
l	Disclosure of Price Sensitive Information	30(6)
m	Shareholding Pattern prior to listing of securities	31(1)(a)
n	Record date or Date of closure of transfer books	42(2)
o	Record date for declaring dividend and /or cash bonus	42(3)
p	Change in name of listed entity	45(3)
q	Disclosure of information or events	30
r	Reconciliation of Share Capital Audit Report	55A of SEBI (Depositories and Participants) Regulations, 1996
s	Disclosures under Code of Internal Procedures And Conduct For Regulating, Monitoring And Reporting of Trading By Insiders	10 (1)
t	Board and Board Committee Materials: Meeting minutes should be retained in perpetuity in the Company's minute book. A clean copy of all Board and Board Committee materials should be kept as long as they remain current or for 8 financial years, whichever is later.	



4.3 Other

(a) Employment Records/Personnel Record: Several Central & State statutes require the Company to keep certain recruitment, employment and personnel information. The Company should also keep personnel files that reflect performance reviews and any complaints brought against the Company or individual employees under applicable Central & State statutes. The Company should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file.

Employment and personnel records should be retained for eight years or till the cessation of the employee.

(b) Press Releases/Public Filings: The Company should retain permanent copies of all press releases and publicly filed documents under the theory that the Company should have its own copy to test the accuracy of any document a member of the public can theoretically produce against that Company. Press releases / public filings related documents should generally be maintained for a period of eight years or till the completion of the case, whichever is later.

(c) Legal Files: Legal counsel should be consulted to determine the retention period of particular documents, but legal documents should generally be maintained for a period of eight years or till the completion of the case, whichever is later.

(d) Tax Records: Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Company's revenues.
Tax records may be retained for at least Eight years from the date of filing the applicable return.

(e) Marketing and Sales Documents: The Company should keep final copies of marketing and sales documents for the same period of time it keeps other corporate files, generally eight (8) years.

(f) Contracts: Final, execution copies of all contracts entered into by the Company should be retained. The Company should retain copies of the final contracts for at least eight (8) years beyond the life of the agreement, and longer in the case of publicly filed contracts.

(g) Development/Intellectual Property and Trade Secrets: Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to the Company and are protected as a trade secret where the Company:

- (i) Derives independent economic value from the secrecy of the information; and
- (ii) The Company has taken affirmative steps to keep the information confidential.



The Company should keep all documents designated as containing trade secret information for at least the life of the trade secret.

(h)Electronic Mail: E-mail that needs to be saved should be either:

- (i) Printed in hard copy and kept in the appropriate file; or
- (ii) Downloaded to a computer file and kept electronically or on disk as a separate file.

Electronic documents will be retained as if they were paper documents. Therefore, the electronic files should be maintained for the appropriate amount of time depending upon the subject matter of the email and should be determined primarily by the application of the general guidelines affecting document retention. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an “archive” computer file folder. Backup and recovery methods should be tested on a regular basis.

5. General

Notwithstanding anything contained in this Policy, the Company shall ensure to comply 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.

5. Preservation of Documents

The documents specified in Item Nos. 4.1 to 4.3 shall be kept either in electronic mode / in hard copies.

6. 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.
