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## POLICY ON PRESERVATION OF DOCUMENTS

[As per Regulation 9 of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015]

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### POLICY ON PRESERVATION OF DOCUMENTS

#### PURPOSE OF POLICY

Regulation 9 of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015 [herein after referred to as “SEBI (LODR) Regulations” or “Regulations”, requires every listed entity to have a policy on preservation of documents/ records either in Physical Mode or Electronic Mode.

The corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per this Policy.

This Policy categorizes the records that whose preservation shall be permanent in nature and documents that will be preserved for specified period of time and outlines responsibilities to create, maintain and lawfully dispose of the records. It endorses the preservation of records in the Company’s Archives.

#### DEFINITIONS

- i. **“Company”** means **FOUNDATION TO EDUCATE GIRLS GLOBALLY**.
- ii. **“Board”** means the board of directors of the Company.
- iii. **“Documents”** means as defined in Sub- Section 36 of Section 2 of the Companies Act, 2013
- iv. **“Electronic Records”** means as defined in Information Technology Act, 2000 or as amended from time
- v. **“Electronic Form”** means as defined in Information Technology Act, 2000 or as amended from time
- vi. **“Listing Regulations”** means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015
- vii. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed
- viii. **“Policy”** means this Policy of Preservation of Documents of the Company;
- ix. **“Records”** in relation to this policy includes accounting records, books or papers and books and papers as defined in Sub-Section 12 of Section 2, books of accounts as defined in Sub-Section 13 of

Section 2 of the Companies Act, 2013, statutory and other documents of material significance whether covered under this Policy or not.

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.

### **OBJECTIVE OF POLICY**

This Policy mechanism provides the comprehensive framework for preservation of documents for a specified period of time to achieve the following objectives:

- a) Effective corporate governance and risk management;
- b) Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- c) Systematic disposal/destruction of Company's non-current records that have outlived their administrative usefulness.
- d) Identification of the Company's records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company's Archives.

### **SCOPE OF THE POLICY**

For the purpose of achieving the above objectives, the documents covered as per this Policy have been divided into two sections, i.e., the records or the documents that will be preserved permanently by the Company and the records or the documents that will be preserved for the period of at least 8 years and not permanently. This Policy applies to the records maintained by the Company in any format or medium. The records which are not required to be retained permanently shall be disposed off according to this Policy.

### **AUTHORITY AND RESPONSIBILITY**

The officer designated by the Board of the Company in this behalf, shall be responsible for the preservation of the records according to the time frame prescribed in the Policy for their preservation.

All staff and management of the Company shall assist in implementing this Preservation Policy as appropriate to their roles and responsibilities.

Based on the requirement and for the purpose of effective management, the period for which the records of the Company shall be maintained have been classified into two categories:

- i. Documents whose preservation shall be permanent in nature;
- ii. Documents whose preservation shall be at least 8 years.

The classification of the documents has been made in the Annexure which forms part of this Policy.

While prescribing different time period for preservation of records, the following aspects have been taken into account:

- (a) Compliance with statutory and regulatory requirements.
- (b) Satisfaction of the needs of SEBI/MHA/MCA inspectors to have access to certain records.
- (c) Satisfaction of the needs of internal and external auditors to have access to certain records.

The documents or records not covered by this Policy shall be maintained by the Company for the time period specified for their preservation under any statute or regulation by which they are governed.

### **LOCATION OF RECORDS**

The records shall be maintained at the corporate office, field offices and/or with an agency which specialises in record management and archival services or at any other place as may be approved by the Board, from time to time.

### **ACCESS AND AUTHENTICITY**

The preservation of the records of the Company is vital in order to ensure all current and future access to the records. Preservation is also concerned with ensuring the authenticity of records.

The Company shall prepare a matrix for identifying persons who will be allowed to access different kind of records maintained & preserved by the Company. Since the records are maintained at different levels and departments in the Company, therefore Functional Heads would be authorized to ensure the preservation and access to the Records under their jurisdiction.

### **RECORD RETENTION SCHEDULE**

The records referred to in Annexure A of this Policy shall be maintained permanently and Records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use, therefore disposal will aid efficiency. The records referred in Annexure A(B) shall be preserved for at least 8 years and thereafter as per the discretion of the Board records may be disposed of in the manner prescribed by it.

### **MODE OF PRESERVATION**

The Documents may be preserved in

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

The official of the Company required to preserve the document shall be Authorised 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 Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

- Destruction of documents

The documents of the Company which are no longer required as per the time schedule prescribed in the Annexure A may be destroyed. The Company may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under Annexure A(A). The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format and time to be prescribed. The entries in the register shall be authenticated by the Authorised Person.

### **RECORD APPRAISAL**

The Company shall at regular intervals carry out the appraisal of the records preserved as per this Policy. The purpose of the appraisal process is to ensure the records are examined at the appropriate time to determine whether or not they are worthy of archival preservation, whether they need to be retained for a longer period as they are still in use, or whether they should be destroyed. The appraisal of records shall be undertaken only after the approval of the Board of the Company.

### **REVIEW OF THE POLICY**

This Policy may be amended with the approval of CEO and CFO as may be deemed necessary and in accordance with any regulatory amendments.

Should there be any inconsistency between the terms of the Policy and the Listing Regulations, the provisions of the Listing Regulations shall prevail. Any amendments to the Listing Regulations shall mutatis mutandis be deemed to have been incorporated in this Policy.

## ANNEXURE-A

### INDICATIVE LIST

#### A) PERMANENT PRESERVATION:

- a. Statutory Registers
- b. License and Permissions
- c. Statutory Forms and disclosures except for routine compliance
- d. Register of Members
- e. Index of Members

#### B) TEMPORARY PRESERVATION UP TO 8 YEARS:

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. Office copies of Notice of General Meeting and related papers
- e. Office copies of Notice of Board Meeting/Committee Meeting. Notes on Agenda and other related papers
- f. All notices pertaining to disclosure of interest of directors
- g. Books of accounts, financial statements etc.

#### C) OTHERS:

As per applicable law

#### **Document Change History and Revision Control**

The history of modifications and changes to this document are reflected in this section. All changes, updates, revisions, or comments should be documented and reflected in this section.

<b>Version</b>	<b>Sections revised</b>	<b>Description of revisions</b>	<b>Created by</b>	<b>Reviewed by</b>	<b>Approved by</b>	<b>Date</b>
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