

COLINZ LABORATORIES LTD

CIN NO. L24200MH1986PLC041128

POLICY ON PRESERVATION OF DOCUMENTS

1. PREAMBLE:

The Securities and Exchange Board of India ("SEBI"), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 (Hereinafter called as "**The Regulations**"). The Regulations come into force from December 1, 2015. Pursuant to Regulation 9 of the Regulations every listed Company shall frame a policy on preservation of documents.

In this context, the following policy has been framed by the Board of Directors ("Board") of **COLINZ LABORATORIES LTD** at its meeting held on 31st January, 2016 with objective of classifying various documents, records and registers for the purpose of maintenance and preservation.

The Policy can be modified and or amended with the approval of the Board of Directors only.

2. OBJECTIVE OF THE POLICY:

To facilitate efficient and effective operation of our company, we are implementing the following Policy on document preservation where such preservation shall be of permanent nature as also documents with preservation period of not less than eight years after completion of the relevant transactions to which such document relates.

All business records should be kept no longer than the period necessary for the proper conduct of Company business. This policy shall cover all business records of the Company, including written, printed and recorded matter and electronic forms of records. The Vice President (Administration) and the Compliance Officer jointly would be responsible for overseeing the implementation of the Policy.

This policy is framed as per requirement of Regulation 30 (4) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

3. DEFINITIONS

- a) Act: "Act" means the Companies Act, 2013 including any amendment or modification thereof.
- b) Board: "Board" means Board of Directors of the Company
- c) Company: "Company" means COLINZ LABORATORIES LTD.

COLINZ LABORATORIES LTD

CIN NO. L24200MH1986PLC041128

- d) Compliance Officer: "Compliance Officer" means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
- e) Director: "Director" means a person as defined in Section 2(34) of the Companies Act, 2013 and presently appointed as a Director in the Company.
- f) Document: "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes Minutes, declarations, advertisements, correspondence, summons, notice, requisition, order, forms, register and other record, required under or in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- g) Employees: "Employees" shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.
- h) Regulations: "Regulations" shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015
- i) Secretarial Standards: "Secretarial Standards" means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.
- j) Maintenance: "Maintenance" means keeping Documents, either physically or in Electronic Form.
- k) Preservation: "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.
- l) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, The Securities Contract (Regulation) Act, 1956 or any other applicable law or regulations.

4. PRESERVATION OF DOCUMENTS

The Company shall preserve all its Documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, Secretarial Standards, the Listing Regulations and any other law, Rules, regulations as may be applicable to the Company from time-to-time.

COLINZ LABORATORIES LTD

CIN NO. L24200MH1986PLC041128

Documents which are to be maintained permanently:

The Company shall maintain the following Documents on a permanent basis:

- a. The Certificate of incorporation
- b. The Certificate of commencement of Business
- c. Memorandum of Association & Articles of Association
- d. Minutes of General Meeting, Board Meeting and Various committee meetings
- e. Register of members along with Index
- f. Register of Loans, Guarantee, Security and acquisition made by the Company
- g. Registrar of investment
- h. Register of Charges
- i. Register of Contract with Related Party and contracts and Bodies etc. in which Directors are interested
- j. Register of renewed and duplicate share certificates
- k. Register of Directors and KMPs
- l. Register of disposal of records
- m. Intellectual property Documents shall include, but shall not to be limited to Copyrights, Trademarks, Patents and industrial Designs.

Documents which are to be maintained for at least eight financial years:

- a. Books of accounts together with the vouchers relevant to any entry in such books of account
- b. Register of Debenture holders or Register of any other Securities issued by the Company
- c. Copies of Annual Returns
- d. Disclosure of Interest received from the Directors of the Company in manner prescribed
- e. Attendance Register, Notices, Agenda, Notes on agenda and other related papers of General Meeting, Board Meeting and various Committee Meetings
- f. Register of Deposits accepted or renewed, if any
- g. Tax Records- Tax records including, but not limited to documents concerning tax assessment, tax filing, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for the period of 8 years or for a period of 8 years after a final order has been received with respect to any matter which was preferred for appeal, as the case may be.
- h. Press releases
- i. Employment/Personnel record in case of employees of the Company
- j. Relevant marketing and sales documents
- k. Forms and returns filed with RBI/MCA or with any other statutory authority
- l. Compliance Reports received from any statutory authority

COLINZ LABORATORIES LTD

CIN NO. L24200MH1986PLC041128

5. LOCATION OF RECORDS

As mandated by the Companies Act, 2013 or under any other statute, certain records shall be located at the registered office of the Company. The records for which no specific place has been specified under any statute may be maintained at the corporate office of the Company or at any other place as may be, decided by the officers of the Company considering their utilization and usefulness.

6. MODE OF MAINTENANCE

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to.

All the records shall be maintain as per the prescribed formats, if any, as amended from time-to-time under the various rules and regulations.

7. DISPOSAL AND DESTRUCTION OF RECORDS

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents. The Documents may be destroyed as follows:

- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Delete or destroy electronically stored data.