

PROMONT HILLSIDE PRIVATE LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

PREAMBLE:

As per Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, every listed company is required to have a policy for preservation of documents approved by its Board of Directors, classifying them as documents whose preservation shall be permanent in nature and documents with preservation period of not less than 8 (Eight) years after completion of relevant transactions. Accordingly, the Board of Directors of the Company has approved this policy for preservation of documents/ records maintained by the Company either in physical mode or electronic mode. Also the Board is authorized to modify this policy as may be required from time to time, in view of the amendments in the regulatory requirements.

PURPOSE OF THE POLICY:

The purpose of this policy is to lay down a framework for effective management of the records at the Company and to ensure the preservation and protection of the records as per the statutory requirements. This policy is also meant to set principles underlying the Company's approach to preservation of its records and to define the obligation of the employees in retaining and preserving the records which are required to be maintained as per the applicable statutory and regulatory requirements.

DEFINITIONS:

"Act" means the Companies Act, 2013 and Companies Act, 1956.

"Preservation" means the maintenance of documents, files and records in usable form and to prevent from being altered, damaged or destroyed.

"Records" means recording of information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity.

"Company" means Promont Hillside Private Limited.

"Board of Directors" or **"Board"** means the Board of Directors of Promont Hillside Private Limited, as constituted from time to time.

"Policy" means policy on Preservation of records, including any modifications, as may be approved by the Board from time to time.

Storage Options” means

Online storage: Records are kept on a server or hard drive and are immediately available for use over a network. This option is best for records that must be accessed frequently.

Near-line storage: Records are stored on media such as optical disks in jukeboxes or tapes in automated libraries which are attached to a network. Because retrieval is slower than with online storage, this option is most appropriate for records that are accessed occasionally.

Offline storage: Records are stored on removable media and must be manually retrieved. This option provides the slowest access and would be used for records that are only rarely needed.

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

POLICY:

a) LEGISLATIVE FRAMEWORK AND STANDARDS

- Companies (Preservation and Disposal of Records) Rules, 1966
- Companies Act, 2013.
- Secretarial Standard - 1 (Board Meetings)
- Secretarial Standard - 2 (General Meetings)
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

b) MAINTAINENCE OF RECORDS

- The content and essential characteristics of digital records must remain unchanged through preservation.
- Digital records can be maintained in forms such as emails, web pages or database records, plus scanned versions of paper records that have been digitised in business processes.
- Physical records to be maintained in books and files.
- All digital and physical records to be saved at the registered office of the Company and no physical records can be migrated without permission of Executive Director or Company Secretary or Chief Financial Officer (“Authorised Officer”) or with the prior approval of the Board as may be required pursuant to the provisions of the Act.
- A reproduction of any original record on microfilm or on any other medium shall be certified by an Authorised Officer of the Company to be true and accurate reproduction of the original of such record.

c) DISPOSAL AND DESTRUCTION OF RECORDS

- All records mentioned in **Annexure A** which are temporary in nature must be preserved for not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed.
- All records mentioned in **Annexure B** need to be preserved by the Company permanently during the entire life of the Company.
- Utmost care is to be taken to ensure that files are neither prematurely destroyed nor kept for period longer than necessary.
- The Company shall maintain a register as specified in **Annexure C**, wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by authorised officer for the purpose. Inspection of this register is restricted. After the completion of the prescribed storage period of 8 (Eight) years as stated above, the destruction of records in Annexure A, shall be conducted as follows:
 - i. **Digital Records:** Digital Records which may be stored on the disc, floppy, servers, hard discs, virtual data room, web-based portal or any other data drive, shall be deleted permanently from all the online and offline sources available
 - ii. **Physical Records:** Physical Records which may be stored in the books, records, registers, binders, papers, copies shall be destructed/ teared/ shredded/ cancelled/ defaced/ ignited permanently from all the sources availablein presence of at least one Director or any other Authorised person, as may be decided by the Board for the purpose.

d) DISCLOSURE:

This Policy will be communicated to all operational employees and other concerned persons of the Company and be disclosed on the Company's website.

-----XXX-----

ANNEXURES

SNO	Annexure A	Annexure B
1	Proxy Forms	Certificate of Incorporation & Commencement of Business
2	Annual Reports	Certificate of change of name (if any)
3	Annual Returns	Memorandum and Articles of Association
4	Consent and Resignation Letters from Directors	Minutes Book
5	Board Agenda and Supporting documents	Circular resolutions
6	Office copies of Notice of General Meetings and related papers	Statutory Registers
7	NSDL/CDSL files	License & Permissions
8	Annual Financial Statements	
9	Declaration by Directors under Section 164 & 184 of the Companies Act, 2013	
10	All documents under the listing agreement/ Listing Regulations	
11	Notice of General and Board Meetings	
12	Statutory Advertisements published	
13	Inward file giving information about various correspondence received from outside agencies requiring secretarial action	
14	Accounting records, vouchers etc.,	
15	All the documents/ records created pursuant to the provisions of the Companies Act, 2013 and the rules made thereunder	

Annexure C

SNO	Particulars of Documents Destroyed	Date and mode of destruction	Prepared by	Checked by	Approved by

-----XXX-----