

# **BLB LIMITED**

## **POLICY ON PRESERVATION OF DOCUMENTS**



## **I. PREAMBLE**

The Board of Directors (the "Board") of BLB Limited (the "Company" or "BLB"), has adopted the below mentioned policy and procedures with regard to preservation of documents.

This Policy is framed as per the requirement of Clause 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. This amended Policy will be applicable to the Company w.e.f. 12<sup>th</sup> February, 2021.

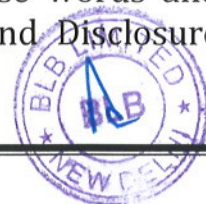
## **II. PURPOSE**

The main purpose of the policy is to have a 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:

1. Annexure 1 of the policy contains documents whose preservation shall be permanent in nature;
2. Annexure 1 of the policy contains documents whose preservation shall be shall be temporary in nature and shall be maintained in the following manner:
  - All such documents having preservation period of 8 (eight) years or period as per applicable laws, shall be preserved for such period as prescribed under the applicable laws but not less than 8 (eight) years.
  - All other documents for which the period of preservation is not prescribed under any laws shall be preserved at the discretion of Board of Directors of the Company or any such specific period as the Company deems necessary, as may be mentioned against each item.

## **III. DEFINITIONS**

Unless the context otherwise requires, words and expressions used in this policy shall be as per definition given in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. In case words and expressions not defined in SEBI (Listing Obligations and Disclosure



Requirements) Regulations, 2015, shall have the meaning respectively assigned to them under Companies Act, 2013.

#### **IV. COVERAGE OF DOCUMENTS**

This Policy shall apply to documents maintained by the Departments as required but not limited to the documents maintained under the Companies Act, 2013 and Rules made thereunder, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and other Regulations/Guidelines notified by the Securities and Exchange Board of India, as amended from time to time.

#### **V. IDENTIFICATION OF DOCUMENTS**

Pursuant to this Policy, the Departments of the Company shall review the documents maintained by them for determining the period of preservation. While determining the period of preservation of documents, the Departments shall ensure due compliance with the applicable laws and regulations.

The Departments will submit a list of documents to be preserved alongwith the preservation period duly signed by the Head of the Department to the Company Secretary of the Company.

A consolidated list shall be prepared by the Secretarial Department of the Company on the basis of lists submitted by the Departments. Such list shall be reviewed annually by the departments at the end of each financial year for addition/deletion of documents.

#### **VI. MAINTAINING RECORDS OF DOCUMENTS**

- a) Documents shall be maintained and preserved properly and stored in chronological order or in any other logical manner by the Departments to facilitate easy identification and retrieval.





- b) Documents shall be properly dated so that their preservation period can be identified easily.
- c) Documents shall be stored in such a way that their confidentiality can be maintained.
- d) The Departments may consider maintenance and preservation of their documents in electronic form unless maintenance and preservation of documents in physical form is a statutory requirement.
- e) On completion of the Preservation Period, records may be destroyed after obtaining approval of the Board.

## **VII. DISCLOSURES**

The Policy for preservation of documents shall be kept under the custody of the Company Secretary or Chief Financial Officer or any other person as the Board may decide in the Company.

## **VIII. AMENDMENT**

The Board of Directors on its own can amend this Policy, as and when it deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time.

This policy has been framed in accordance the requirement of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and other applicable acts and laws for the time being in force. In case, any part of the policy becomes inconsistent with the any act and law for the time being in force, the provision of that Act and Laws shall prevail and shall be binding.



In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.



**For BLB LIMITED**

*Apd*

**Place : NEW DELHI**  
**Date : 12.02.2021**

**ANSHUL MEHRA**  
**EXECUTIVE DIRECTOR**

**ANNEXURE 1**

**Documents whose preservation shall be permanent in nature**

| <b>Sr. No.</b> | <b>Particulars</b>  |
|----------------|---|
| 1.             | Documents and information filed with ROC for Incorporation of the Company   |
| 2.             | Common seal, certificate of incorporation and certificate of change of name, if any)  |
| 3.             | Certificate for commencement of business, if any  |
| 4.             | Memorandum of Association and Articles of Association as amended from time to time  |
| 5.             | Agreements made by the Company with the Stock Exchanges and Depositories, etc.  |
| 6.             | Minutes Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013 and the Regulation                           |
| 7.             | Cancelled Share certificates  |
| 8.             | Licenses , Certificate and permissions obtained from any statutory authority  |
| 9.             | Order from Courts and any other regulatory authorities  |
| 10.            | Statutory registers required to be maintained under various applicable laws   |
| 11.            | Statutory forms except for routine compliance   |
| 12.            | Files relating to premises for instance Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger / Register |
| 13.            | Policies of the Company framed under the Companies Act, 2013 and various regulations from time to time.                                 |
| 14.            | Any other documents as may be required to be maintained in terms of applicable law(s) and preserved from time to time.                  |



ANNEXURE 2

**Documents whose preservation is not permanent in nature**

| Sr. No. | Particulars  |
|---------|--|
| 1.      | Annual Returns   |
| 2.      | Attendance Register of Board/General Meeting   |
| 3.      | Income tax papers  |
| 4.      | Notices of General Meetings/ other such meetings and supporting documents all other  |
| 5.      | Employees Information Records  |
| 6.      | Disclosure of interest by the Directors  |
| 7.      | Instrument creating a charge or modification   |
| 8.      | Books of accounts and financial statements etc.  |
| 9.      | Any other important documents including tax filling and papers, project documents and any other such documents and papers. |
| 10.     | Scrutinizers report  |

