



Preservation of Documents and Web Archival Policy

PRESERVATION OF DOCUMENTS AND WEB ARCHIVAL POLICY

1. INTRODUCTION

The policy is framed in accordance with the requirement of the provisions of Regulation 9 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”) and Companies Act, 2013.

This policy has been adopted by the Company's Board of Directors in order to set forth the guidelines for Preservation of documents.

Further, Regulation 30(8) requires the company to frame a policy and host it on the website for disclosure and archival of such disclosures.

2. OBJECTIVE

This policy sets the standard for classifying, managing and storing of records of the Company. The purpose of this policy is to establish a framework for effective record management and the process of subsequent archival of such records. The Objective behind the framing of the Policies is to comply with:

- (1) Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows-
 - a) Documents whose preservation shall be permanent in nature ;
 - b) Documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

- (2) Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under Regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per applicable provisions of Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

Accordingly this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

3. DEFINITIONS

“**Applicable Law**” means any law, rules, regulations, circulars, guidelines or standards under which the preservation or archival of the documents has been prescribed.

“**Archive/archiving**” is the process of transferring records to a repository managed by personnel specialized in storing, appraising, conserving and authorizing access to the records entrusted. Archiving allows for future retrieval and use of information. Archiving serves two main functions: conserving evidence in case of a legal claim or audit, and preserving the historical memory and proof of an activity.

“**Board**” in relation to the company, means the collective body of the directors of the company.

“**Company**” means Macpower CNC Machines Limited.

“**Documents**” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulations for the time being in force.

“**Electronic Form**” means any electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the company or otherwise accessible to the Company.

“**Listing Regulations**” mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 including any modifications, clarifications, circulars and re-enactment thereof.

“**Maintenance**” means keeping documents, either physically or in electronic mode as may be permitted under Act/Regulations for the time being in force including authentication and custody of such documents.

“**Preservation**” means to keep in good order, to prevent from being damaged or destroyed.

“**Policy**” means this policy on preservation of documents and Web Archival Policy and as may be amended from time to time.

4. TYPE OF DOCUMENTS AND DUARTION OF PRESERVATION

The Documents to be preserved are categorized in two categories as follows:

- I. The documents of a permanent nature (as per **Annexure I**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.
- II. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (as per **Annexure II**) shall be preserved by the Company for a term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Notwithstanding the above, in case any such documents are required to be preserved in accordance with the directions of the court or if the matter is sub-judice then the concerned documents shall be preserved until such time the matter is conclusively disposed-off.

5. LOCATION/ PLACE OF PRESERVATION OF DOCUMENTS:

All the Documents whether physical or electronic will be preserved at the Registered office of the Company as mentioned below

ADDRESS OF REGISTERED OFFICE

PLOT NO. 2234, NEAR KRANTI GATE,
GIDC, METODA - 360021.
RAJKOT - GUJARAT

6. PRESERVATION PRINCIPLES

The company shall primarily utilize any of the combination in preserving the records as the departmental head may deem fit.

7. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents which shall be subject to approval of Managing Director or CFO or CS in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

8. WEB ARCHIVAL POLICY

The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s) and also all documents that are required under Companies Act, 2013.

Such disclosure shall be retained on the website of the company for minimum period of five years. Thereafter the information shall be archived and preserved for a further period of three years.

9. DESTRUCTION OF DOCUMENTS

The Documents may be destroyed after expiration of the statutory retention mentioned above in such mode by the department head(s), subject to approval of Managing Director or CFO or CS.

10. AMENDMENTS IN POLICY

The Board of Directors can amend this Policy, as and when 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. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not 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.

Annexure I

Documents whose preservation shall be permanent in nature

Sl. No.	Document
1	Copies of all documents and information as originally filed under section 7(1) (incorporation) till dissolution under the Companies Act, 2013
2	Register of Renewed and Duplicate Share Certificates
3.	Share certificate forms and related books and documents – Disputed cases
4.	Register of Charges
5.	Register of Members along with the index
6.	Minutes of proceedings of general meeting and resolutions passed by postal ballot, meeting of Board of Directors, creditors, committees of the Board and resolutions passed by Circulation.
7.	Register u/s 186 of the Companies Act, 2013 (loan/ guarantee/ security or making an acquisition of securities)
8.	Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person)
9.	Register u/s 189 of the Companies Act, 2013 (Register of contracts or arrangements in which directors are interested as per section 184 & 188 of the Act)

Annexure II

Documents with preservation period of not less than eight years after completion of the relevant transactions

A) As per Companies Act, 2013

Sr. No.	Document
1.	Instrument creating charge or modification thereon
2.	Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto
3.	All notices for disclosure of concern/ interest received u/s 184 of the Companies Act, 2013
4.	The attendance register of Board & Committee Meetings
5.	Office copies of Board Meeting Notices, Agenda, Notes on Agenda and other related papers of the company
6.	Office copies of general meeting Notices, scrutinizers report and other related papers of the company
7.	Any other register /documents required by any law, for the time being in force
8.	Books of Accounts

B) As per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 apart from Documents mentioned in Annexure 1 & Annexure 2(A)

Sl. No.	Document
1	Statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter.
2	Prior intimation to stock exchange about the meeting of the board of directors
3	Disclosures of any material events or information
4	Statement showing holding of securities and shareholding pattern separately for each class of securities
5	Statement of deviation(s) or variation(s) in the use of proceeds from the objects stated in the offer document or explanatory statement to the notice for the general meeting, for public issue, rights issue, preferential issue etc.
6	Half yearly and year-to-date standalone/ consolidated financial results
7	As part of financial results for the half year by way of a note a statement of assets and liabilities as at the end of the half-year
8	Annual report
9	Annual Information Memorandum
10	a certificate from a practicing company secretary, certifying that all certificates have been issued within thirty days of the date of lodgement for transfer, sub-division, consolidation, renewal, exchange or endorsement of calls/ allotment monies.
11	Intimation of record date
12	Details regarding the voting results of general meetings
13	Any and all kinds of filing to Stock Exchanges, viz. Press Release, Investors Presentation, etc.

Note: All the remaining Documents not covered above in the Annexure (1) and (2) Shall be preserved for 8 Years.