

# KALYANI INVESTMENT COMPANY LIMITED

## Policy for Preservation of Records

### INTRODUCTION

The Board of Directors (the “Board”) of Kalyani Investment Company Limited (the “Company”) has adopted the following Policy for Preservation of Records of the Company (the “Policy”). The Board may review and amend this Policy from time-to-time.

### OBJECTIVE

This Policy is framed in accordance with the requirement of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “Regulations”) and is intended to provide the systematic review, retention, and destruction of documents received or created in the course of business.

This Policy covers all documents, whether in paper or electronic form, which are created or received by the Company in the course of its activities (the “Document”).

### APPLICABILITY

This Policy is applicable to the Company and all corporate/business operations of the Company.

Any Capitalized term used herein but not defined shall have the meaning assigned to such term under the Regulations or any other applicable law or regulations.

### I. RETENTION PERIOD

Documents shall be retained in the following manner:

Sr. No.	Document	Retention Period and Method of Destruction of Documents
1	Documents for which applicable law or regulation specify retention period	As prescribed under the applicable law or regulation
2	Documents mandated by Contract/ Agreement	As per terms and conditions of such Contract/Agreement
3	Any other Documents	As prescribed under “Record Retention procedure” adopted under internal policy of the Company adopted from time-to-time.

### II. PROCEDURES

1. The respective department shall be responsible for establishing procedures for handling, retrieving and systematic destruction of Documents.
2. Each department shall nominate an individual responsible for co-ordination and implementation of the Policy.
3. Documents which have completed their retention period shall be disposed-off by the nominated authorities of the respective department.

4. Suspension of destruction – If there is any actual or potential litigation or dispute or order by an administrative or judicial authority, the Documents relating to such litigation, dispute or order (“Suspended Documents”) shall not be destroyed. Such Suspended Documents shall be retained until released by Head of Legal Department.
5. The respective department shall maintain the following details in respect of destroyed Documents:
  - a. Particulars of Document
  - b. Date of destruction
  - c. Reason for destruction
  - d. Name of Owner of Document
  - e. Name and Designation of authority approving destruction

### **III. RETENTION AND ARCHIVAL OF DOCUMENTS HOSTED ON COMPANY’S WEBSITE**

The documents/information/events disclosed on the Company’s website shall be hosted on the website of the Company as prescribed under the Regulations and any other applicable law or regulation from time to time. Thereafter, such documents/information/events shall be archived to the Company’s server and shall be retained for such further period as required under applicable law or regulation.

### **IV. SCOPE AND LIMITATION**

In the event of any conflict between the provisions of this Policy and the Regulations or any other statutory enactments, the statutory enactments shall prevail over this Policy.

### **V. AMENDMENTS AND UPDATES**

The Board shall review periodically this Policy and shall also have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy. The Board may also establish further rules and procedures, from time-to-time, to give effect to the intent of this Policy and further the objective of good corporate governance.

This Policy in whole or in part, shall stand modified / amended from time-to-time, without any further act on the part of the Company, as and when there would be any statutory modification(s) / amendment(s) / revision(s) to the applicable provisions thereto.

For Kalyani Investment Company Limited

Amit B. Kalyani  
Chairman

February 13, 2016  
Pune