

POLICY ON PRESERVATION OF DOCUMENTS

1) INTRODUCTION

The securities of Innovators Façade Systems Limited (the “Company”) is in process of getting listed on BSE SME Platform of the Bombay Stock Exchange Limited (the “Stock Exchange”) and are required to comply with relevant provisions of Companies Act, 2013 & Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”). The Listing Regulations mandate listed entities to formulate a policy for ‘Preservation of Documents’ which has to be approved by the Board of Directors of the Company. It is in this context, the ‘Policy on Preservation of Documents’ (“Policy”) has been framed and the Board of Directors of the Company has approved the same at its meeting held on March 09, 2018 and the said Policy shall be effective from March 10, 2018.

2) OBJECTIVE

The objective and purpose of this Policy is to provide a framework for preservation of documents of the Company required to be maintained in terms of any statutory or regulatory requirements, including the provisions of the Companies Act, 2013, rules made thereunder and the Listing Regulations and other regulations made by Securities Exchange Board of India from time to time.

3) DOCUMENTS TO BE MAINTAINED, PRESERVED AND PRESERVATION PERIOD

- A) The Company shall maintain and preserve the following documents on a permanent basis:
- i) Certificate of Incorporation.
 - ii) The original Memorandum of Association and the Articles of Association of the Company.
 - iii) Minutes of General Meetings, Board Meetings and various Committee Meetings.
 - iv) Minutes of the Meetings of Creditors.
 - v) Register of members along with index thereof.
 - vi) Register of Renewed and Duplicate share certificates.
 - vii) Register of charges.
 - viii) Fixed Asset Register.

- ix) Register of Loans, guarantees and securities provided by the Company.
 - x) Register of Investments of the Company not held in its own name, if any.
 - xi) Register of Contracts with Related Party, bodies corporate etc. in which the Directors of the Company are interested.
 - xii) Register of Directors and Key Managerial Personnel.
- B) The Company shall maintain and preserve the following documents for at least eight financial years:
- i) Books of Accounts together with relevant vouchers.
 - ii) Attendance Register for the Meetings of Board and its Committees.
 - iii) Attendance Register of General Meetings.
 - iv) Register of Debenture holders / other securities holders along with index thereof.
 - v) Register of deposits accepted and renewed.
 - vi) Copies of Notices, Agenda, Notes on Agenda and other related papers of Board and its Committee Meetings.
 - vii) Copies of Notices, Scrutinizers Report and related papers of General Meetings and Postal ballots.
 - viii) Instruments creating or modifying the charge.
 - ix) Annual Returns prepared under Section 92 under Companies Act, 2013.
 - x) Disclosure of Interest by Directors.
 - xi) Shareholding Pattern filed with the Stock Exchange.
 - xii) Corporate Governance Report, submitted to the Stock Exchange.
 - xiii) Reconciliation of Share Capital Audit Reports submitted to the Stock Exchange.
 - xiv) Documents filed with Registrar of Companies or Ministry of Corporate Affairs (other than the documents which are required to be maintained / preserved permanently).

C) **Other Documents**

In case, any document is required by any law or regulation to be maintained permanently or for a specific period of time, it shall be so maintained by the Company.

4) **MODE OF MAINTENANCE OF THE DOCUMENTS**

The Company shall preserve the aforesaid documents in physical or electronic form, at its discretion and as may be permitted under the Companies Act, 2013 or any other law for the time being in force. The Company shall endeavour to preserve all the documents enlisted above in accordance with this Policy. However, the Company shall not be liable for any destruction of documents due to causes beyond its reasonable control, including, but not limited to, governmental actions, fire, civil disturbances, natural disasters, vis. Major or other acts of God.

5) **CUSTODY OF RECORDS**

The documents enlisted above shall be kept in the custody of the Company Secretary or any other person, duly authorised by the Board.

6) **DISPOSAL AND DESTRUCTION OF DOCUMENTS**

The documents referred to in Paragraph 3(B) above of this Policy may be destroyed/disposed-off by the Company after the expiry of eight financial years, in a secure manner which shall prevent the retrieval/recovery of the same by any means, only on authority of the Board of Directors or any committee of the Board constituted for this specific purpose.

7) **AMENDMENT TO THE POLICY**

The Policy may be modified or amended with the approval of the Board of Directors of the Company.

8) **LIMITATION AND AMENDMENT**

The Board of Directors may in their discretion and on recommendation of the any committee of the Board constituted for this specific purpose, make any changes/modifications and/or amendments to this Policy from time to time. In the event of any conflict between the provisions of this Policy and of the Companies Act 2013 or Listing Regulations or any other statutory enactments, rules, the provisions of such Companies Act 2013 or Listing Regulations or statutory enactments, rules shall prevail over and automatically be applicable to this Policy and the relevant provisions of the Policy would be amended/modified in due course to make it consistent with the law.