

PDOIL POLICY FOR PRESERVATION & ARCHIVAL OF DOCUMENTS

1. Preamble and Objective

Poona Dal and Oil Industries Limited (the “Company” or “PDOIL”), adopts the Policy for preservation of Documents (the “Policy”) in compliance with the requirements of regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “Regulations”).

2. Applicability

Regulation 9 of the Regulations requires a company to formulate a policy on preservation of documents. Keeping the prescribed requirements in view, PDOIL has framed this Policy. 2. Applicability This Policy shall be applicable to all documents, whether in paper or electronic form, which are created or received by the Company in the course of its all corporate/business operations (the “Document”).

3. Preservation of Documents

The Company shall preserve its Documents as prescribed under the Companies Act, 2013 and under the Regulations. The documents have been classified in below two categories for the purpose of preservation:-

i) Documents which shall be preserved permanently:-

- a) Memorandum and Articles of Association;
- b) Minutes of all types of meetings;
- c) All Statutory Registers under the Companies Act, 2013

ii) Documents which will be preserved for a minimum period of not less than eight years after completion of the relevant transactions:-

- a) Books of Accounts;
- b) Board & Committee Meetings- Attendance register, Notices, Agenda, Notes on Agenda and other related papers; and
- c) General Meetings- Notices, scrutinizer’s report, and related papers.

4. Procedures

- i) The respective department shall be responsible for establishing procedures for handling, retrieving and systematic maintenance of Documents.
- ii) Each department shall nominate an individual responsible for co-ordination and implementation of the Policy.
- iii) Documents which have completed their preserved period shall be disposed-off by the nominated authorities of the respective department.
- iv) The respective department shall be responsible for establishing procedures for handling, retrieving and systematic destruction of Documents.
- v) The destruction of Documents maintained under the Companies Act, 2013 shall be subject to the approval of the Board of Directors of the Company.
- vi) 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 destructed. Such Suspended Documents shall be retained until released by Compliance Officer of the Company.
- vii) 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

5. Amendments

All amendments to the Policy would be subject to approval by Board of Company as per the recommendations of the Audit Committee except in case the amendment in the Policy is necessitated on account of change in the applicable law. In such a case Audit Committee can amend the Policy at its own discretion and any such amendment will be noted by Board in its subsequent board meeting.

6. Interpretation

All capitalized terms used in this Policy but not defined herein shall have the meaning ascribed to such term in the Regulations, as amended from time to time. This Policy is only meant for general guidance. In the event of any conflict between the provisions of this Policy and the provisions of the Regulations made there under, such Regulations shall prevail over the provisions of this Policy.

7. Archival

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the SEBI (Listing Obligations and Disclosure requirements) Regulations, 2015 will be available on the website of the Company for a period of 5 years from the date of its disclosure and thereafter be archived in the archival section of the website of the Company for a period of 2 years.