

Policy for PRESERVATION OF DOCUMENTS

APPLICABILITY:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as “SEBI (LODR) Regulations” or “Regulations”] requires every listed Company to have a Policy for Preservation of Documents, approved by its Board of Directors, Classifying them in at least two Categories as mentioned bellows:

- (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.

In view of the same, the Board of Directors (“the Board”) of Vimal Oil & Foods Limited (“the Company”) has framed the following policy for preservation of documents based on criteria specified in the regulations. The Board of Directors may amend this policy from time to time for complying with the provisions of the regulation and other applicable law. This Policy will be effective from 1st December, 2015.

POLICY OBJECTIVE:

The objective of this Policy is to lay down the principles governing identification and classification of documents and records of the Company (maintained pursuant to applicable laws/ rules/ regulations) for the purpose of secured retention/ archival.

DEFINITIONS:

All the words and expressions used in this Policy, unless defined hereafter, shall have meaning respectively assigned to them under the Listing Regulations and in the absence of its definition or explanation therein, as per the Companies Act, 2013 and the Rules, Notifications and Circulars made/ issued thereunder, as amended, from time to time.

“**Act**” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

“**Board of Directors**” or “**the Board**” means the Board of Directors of Vimal Oil & Foods Limited, as constituted from time to time.

“**Company**” wherever occur in the policy shall mean Vimal Oil & Foods Limited.

“**Current**” means running matter or whatever is at present in course of passage.

“**Documents**” 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 regulation for the time being in force.

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

“Listing Regulations” or **“Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“Maintenance” means keeping Documents, either physical or in electronic Form.

“This Policy” or **“Policy”** means, “Policy on Preservation of Documents”.

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

TIME PERIOD FOR PRESERVATION OF DOCUMENTS:

The Company shall preserve all its documents and records as per the requirements and provisions of the Companies Act, 2013 and the Rules made thereunder, the Secretarial Standards, the Listing Regulations and any other applicable law, rules, regulations. Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is current.

All the documents and records stated in Part A of Annexure to this Policy shall be preserved permanently by the Company.

All the documents and records stated in Part B of Annexure to this policy which are temporary in nature must be preserved for not less than 8 years or such other period as may be prescribed under applicable laws/ rules/ regulations for the time being in force and thereafter the records can be destroyed.

RESPONSIBILITIES:

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

MANNER OF PRESERVATION OF DOCUMENTS:

The Company may preserve documents in Physical Form or electronic Form.

DESTRUCTION OF DOCUMENTS AND REGISTER OF DOCUMENTS DESTROYED:

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a

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normal administrative practice will also be followed for the records which are duplicate/ unimportant/ irrelevant. This applies to both Physical and Electronic Documents.

DISSEMINATION:

The Copy of this policy duly approved shall be placed before the Board and circulated among all the Board of Directors of the Company for their necessary action. The Human Resource and Administration Department are required to notify & communicate the existence and contents of this policy to the employees/ functional head including Chief Executive Officer/ Chief Financial Officer of the Company. The new employees shall be informed about the policy by the Human Resource and Administration department. This policy as amended from time to time shall be made available at the Web site of the Company.

AMENDMENTS:

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

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ANNEXURE

A) PERMENENT PRESERVATION:

- a. Memorandum of Association and Articles of Association as originally filed and updated from time to time
- b. Minutes of Board Meeting
- c. Minutes of General Meeting
- d. Minutes of Committee Meeting
- e. Statutory Registers
- f. License and permissions
- g. Register of members
- h. Index of members
- i. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

B) TEMPORARY PRESERVATION UPTO 8 YEARS:

- a. Annual Returns
- b. Agenda of Board and Committee Meetings and supporting documents
- c. Attendance Register(s)
- d. Office copies of Notice of General Meeting and related papers
- e. Office copies of Notice of Board Meeting / Committee meeting, Notes on Agenda and other related Papers
- f. All notices pertaining to disclosure of interest of directors
- g. Books of accounts, financial statements etc.
- h. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

C) OTHERS:

As per applicable law.