



MOLD-TEK PACKAGING LIMITED

(CIN- L21022TG1997PLC026542)

*Regd. Off: 8-2-293/82/A/700, Ground Floor Road
No. 36, Jubilee Hills, Hyderabad- 500033*

POLICY ON PRESERVATION OF DOCUMENTS

1. PURPOSE OF POLICY:

Regulation 9 of the Listing Regulations (as defined below) requires every listed company to have a policy on preservation of documents/ records either in physical mode or electronic mode (the “**Policy**”).

Mold-Tek Packaging Limited (“**Company**”) has framed this Policy on the basis of Regulation 9 of Listing Regulations and various provisions of the Companies Act, 2013 and other applicable laws. Further, Regulation 30(8) of the Listing Regulations requires the Company to frame the archival policy for website disclosures.

The corporate records of the Company are the important assets for the Company and hence the Company seeks to access and manage its records effectively, and is obliged to create, maintain, preserve and dispose of records as per this Policy.

2. DEFINITIONS:

“**Act**” means the Companies Act, 2013, rules framed there under and any amendments thereto;

“**Applicable Law**” include any statute, law, regulation, ordinance, rule, judgment, order, decree, bye-law, clearance, directive, guideline, notification and clarification issued by any governmental, regulatory or statutory authority or other governmental instruction and/or mandatory standards, as may be applicable to the Company, and as amended from time to time;

“**Board**” means the board of directors of the Company or its committees;

“**Company**” means Mold-Tek Packaging Limited;

“**Documents**” or “**Records**” means papers, notes, agreements, notices, agendas, circulars, correspondences, challans, statutory registers, returns, forms etc. required to be maintained and preserved by the Company in physical or electronic form under the provisions of the Act and such other records under various laws applicable to the Company;

“**Electronic Form**” means as defined in Information Technology Act, 2000 or as amended from time;

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

“**Policy**” means this Policy of Preservation of Documents of the Company; and

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

Any other term not defined herein shall have the same meaning as prescribed to it under the Act, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation, legislation applicable to the Company.

3. OBJECTIVE OF POLICY:

This Policy mechanism provides the comprehensive framework for Preservation of Documents for a specified period of time to achieve the following objectives:

1. Documents whose Preservation shall be permanent in nature and as per Applicable Law;
2. Optimal use of storage space and cost of Preservation;
3. To keep the important documents confidential;
4. Statutory requirements under respective statutes;
5. Systematic disposal or destruction of Company's non-current Records that have outlived their administrative usefulness;
6. Identification of the Company's records that are of continuing administrative and historical value to warrant their transfer to and Preservation in the Company's archives.

4. SCOPE OF THE POLICY:

For the purpose of achieving the above objectives, the Documents covered as per this Policy have been divided into two sections, i.e.

1. the Records or the Documents that will be preserved permanently by the Company; and
2. the Records or the Documents that will be preserved for the period of at least 8 years after completion of the relevant transactions and not permanently.

This Policy applies to the Records maintained by the Company in any format or medium. The Records which are not required to be retained permanently shall be disposed of according to this Policy.

5. AUTHORITY AND RESPONSIBILITY:

The Compliance Officer or Company Secretary, as designated by the Board of the Company in this behalf, shall be responsible for the Preservation of the Records according to the time frame prescribed in the Policy for their Preservation.

All staff and management of the Company shall assist in implementing this Policy as appropriate to their roles and responsibilities.

6. CLASSIFICATION OF RECORDS:

Based on the requirement and for the purpose of effective management, the period for which the Records of the Company shall be maintained have been classified into two categories:

1. Documents whose Preservation shall be permanent in nature;
2. Records to be preserved for specified periods being (i) the period mandated under applicable laws, (ii) the period duly approved by the Functional Heads as per business needs of Mold-Tek Packaging Limited or (iii) for a minimum period of eight years.

The classification of the Documents has been made in the **Annexure A** and **B** which forms part of this Policy.

While prescribing different time period for Preservation of Records, the following aspects have been taken into account:

1. Compliance with statutory and regulatory requirements.
2. Satisfaction of the needs of SEBI/RBI/MCA inspectors to have access to certain Records.
3. Satisfaction of the needs of internal and external auditors to have access to certain Records.

The Documents or Records not covered by this Policy shall be maintained by the Company for the time period specified for their Preservation under any statute or regulation by which they are governed.

7. LOCATION OF RECORDS:

Records shall be maintained in location as per the permission and approval provided under Act or under any other statute. The Records for which no specific place has been specified under any statute shall be maintained at the registered office of the Company or at any other place as may be approved by the Board, from time to time.

8. MODE OF PRESERVATION:

The Documents may be preserved in:

- Physical form; or
- Electronic Form.

The Preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents, other than disposal of Documents as permitted under this Policy.

The preserved Documents must be accessible at all reasonable times. Access shall be controlled by the authorised persons, so as to ensure integrity of the Documents and prohibit unauthorized access.

9. ACCESS AND AUTHENTICITY:

The Preservation of the Records of the Company is vital in order to ensure all current and future access to the Records. Preservation is also concerned with ensuring the authenticity of Records.

The Compliance Officer shall prepare a matrix for identifying persons who will be allowed to access different kind of Records maintained and preserved by the Company. Since the Records are maintained at different levels and departments in the Company, therefore functional heads should be authorized to ensure the Preservation and access to the Records under their jurisdiction.

10. RECORD RETENTION SCHEDULE:

The Records referred to in **Annexure A** of this Policy shall be maintained permanently and the Records which are required to be preserved permanently on the website of the Company shall be preserved in line with the Archival Policy of the Company.

Records should not be kept longer than is necessary and should be disposed of at the right time as unnecessary retention of Records consumes time, space and equipment use, therefore disposal will aid efficiency.

The Company shall maintain a register of Preservation and disposal of Records in the custody of the Compliance officer of the Company, wherein the brief particulars of the Records preserved and/or removed from the location after the expiry of its Preservation period shall be entered. The register of Preservation and disposal of Records shall contain the following columns:

1. Item Number;
2. Brief Particulars of the Records preserved/ disposed of;
3. Date of creation of the Record;
4. Date of removal from the register;
5. Whether preserved permanently or not; and
6. Mode of destruction

This register of Preservation and disposal of Records shall be maintained permanently by the Company with the assistance of the Compliance Officer either in physical or Electronic Form.

11. RECORD APPRAISAL:

The Company shall at regular intervals carry out the appraisal of the Records preserved as per this Policy. The purpose of the appraisal process is to ensure the Records are examined at the appropriate time to determine whether or not they are worthy of archival Preservation, whether they need to be retained for a longer period as

they are still in use, or whether they should be destroyed. The appraisal of Records shall be undertaken only after the approval of the Board of the Company.

12. DISCLOSURE OF THE POLICY:

The necessary disclosure about the policy will also be made as per requirements of the Listing Regulations and the Act.

13. REVIEW OF THE POLICY:

This Policy may be amended with the approval of Board as may be deemed necessary and in accordance with any regulatory amendments.

Should there be any inconsistency between the terms of the Policy and the Listing Regulations, the provisions of the Listing Regulations shall prevail. Any amendments to the Listing Regulations shall mutatis mutandis be deemed to have been incorporated in this Policy.

ANNEXURE – A

Indicative List

Records to be preserved permanently:

Sr. No.	Document/Record
1.	All Documents as may be required under the applicable statute, laws, rules and regulations, namely but not limited to, documents pertaining to certificate of incorporation, PAN card, licences, title deeds, sale / conveyance / lease deeds, general Power of Attorney, database in SAP, drawings, buildings plans, Agreements, registration certificates, statutory / regulatory approvals, trusts deeds, patents, trademarks, copy rights etc. shall be preserved permanently or till the time the asset is in existence with company.
2.	Statutory records and registers required to be maintained under the provisions of the Companies Act shall be preserved permanently.
3.	Minute books containing minutes of the Board Meeting, Board Committee Meeting, General Meeting of members, Court convened Meetings, Meetings of Creditors etc. shall be preserved permanently.
4.	Agenda items and approval note for the agenda items along with relevant annexures thereto pertaining to the meeting of the Board / Committee of the Board shall be preserved permanently.
5.	The record of disposal / destruction along with the approval obtained shall be preserved permanently.
6.	Court Orders.
7.	License/ Statutory Approvals.

ANNEXURE B

Records to be preserved for specified periods being (i) the period mandated under applicable laws, (ii) the period duly approved by the Functional Heads as per business needs of Mold-Tek Packaging Limited or (iii) for a minimum period of eight years.

Sr. No.	Document/Record
1.	All books of account, vouchers, supporting documents etc. shall be kept in good and proper physical condition at-least for a period of eight financial years after the financial year to which they relate to.
2.	The documents relating to assessment of the Company under the direct and indirect taxes shall be preserved for a period of eight years after the financial year to which they relate to. <i>(However, wherever any enquiry has been initiated or legal proceedings is under process, then in such cases all related documents pertaining to the subject issue are to be preserved in proper manner till such time the matter is finally concluded).</i>
3.	All disclosures made by the Company to the stock exchanges shall be hosted on the website of the company for a minimum period of five years upon completion of five years period such disclosures shall be removed from the website of the Company and shall be destroyed by the Administration Department in consultation with Company Secretary.
4.	In addition to the above, all other Documents shall be preserved for such period as may be specified in the relevant statute, law, rules, regulation, guidelines etc. applicable to the respective department.

In addition to the above, all Documents and Records of the Company, which are not specifically referred to or covered in this Policy, shall be preserved for such time period and shall be maintained in such manner ascribed under the applicable law.

Further, notwithstanding anything contained in this policy, in case of any directions from any statutory authorities, tribunals, tax authorities, Registrar of companies, court of laws etc. by an order in writing to preserve any specific document for a period beyond the specified period under this policy, then the concerned Department of the Company would be preserving such documents for such period beyond the specified period till the matter is finally concluded.

Footnote: This policy was last reviewed and updated by the Board of Directors of the Company in its meeting held on the 12th Day of April, 2023.
