

Policy for Preservation of Documents

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PREAMBLE:

This document preservation and archival policy (“**Policy**”), as formulated and adopted by the Board of Directors (“**Board**”) of Onward Technologies Limited (“**Company**”), is formulated as per the requirements of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**SEBI Regulations**”). This Policy deals with the preservation/retention and archival of the corporate records and public disclosures of Company.

The Company is required to maintain certain types of corporate records for a specified period of time under applicable corporate/ securities laws, including but not limited to the SEBI regulations and the Companies Act, 2013 and the rules thereunder (“**Companies Act**”)(collectively, “**Applicable Laws**”) which have been identified below at paragraph 2.

DOCUMENTS REQUIRING PRESERVATION UNDER APPLICABLE LAWS:

- a) The following documents shall be preserved on permanent basis:

Sr. No.	Name of the Document	Reference of Applicable Law
1.	Certificate of Incorporation/ Certificate of Change of Name.	Companies Act
2.	Memorandum and articles of association.	Companies Act
3.	Register of members including separately for each class of equity and preference shares held by each member residing in or outside India along with an index of the names included therein.	Companies Act read with Rule 15(1) of the Companies (Management and Administration) Rules, 2014.
4.	Register of Renewed and Duplicate Share Certificates	Companies Act read with Rule 6(3)(b) of the Companies (Share Capital and Debentures) Rules, 2014.
5.	Register of Charges	Companies Act read with Rule 10(4) of the Companies (Registration of Charges) Rules, 2014.
6.	Register of loans, guarantees, securities and acquisitions.	Companies Act read with Rule 12(3) of Companies (Meetings of Board and its Powers) Rules, 2014.
7.	Register of investments made by the Company not held in its name.	Companies Act read with Rule 14(3) of Companies (Meetings of Board and its Powers) Rules, 2014.

8.	Register of contracts or arrangements in which Directors are interested.	Companies Act read with Rule 16(3) of Companies (Meetings of Board and its Powers) Rules, 2014.
9.	Minutes of meetings of the Board, committees of the Board, general meetings and resolutions passed by postal ballot, meetings of creditors and resolutions passed by circulation. 1	Companies Act read with Rule 25 of Companies (Management and Administration) Rules, 2014.

b) The following Documents shall be preserved for a period not less than 8 years:

Sr. No.	Name of the Document	Regulation Reference
1.	Books of account including relevant books and papers and financial statements ¹	Section 128(5) of the Companies Act
2.	Disclosures/ notices by a Director of his interest	Companies Act read with Rule 9(3) of the Companies (Meeting of Board and its Power) Rules, 2014
3.	Register of deposits	Companies Act read with Rule 14(3) of the Companies (Acceptance of Deposits) Rules, 2014.
4.	Instrument creating a charge or modification ²	Companies Act read with Rule 10(4) of the Companies (Registration of Charges) Rules, 2014.
5.	Annual return and copies of all certificates and documents required to be annexed thereto	Companies Act read with Rule 15(3) of the Companies (Management and Administration) Rules, 2014
6.	Register of debenture holders ³	Companies Act read with Rule 15(2) of the Companies (Management and Administration) Rules, 2014
7.	The attendance registers of Board & Committee Meetings	Secretarial Standard – 1 (4.1.7)

¹ The books need to be maintained for a period of eight financial years immediately preceding the financial year along with all the necessary corollary documents such as the audit trail. However, if there is an investigation that has been ordered against the Company in terms of the provisions of Chapter XIV (*Inspection, Inquiry and Investigation*) of the Companies Act, then the Company may be required to maintain the books of accounts for such additional period as may be directed by the Central Government.

² The instrument for creation or modification of charge must be maintained for a period of eight years after the date of satisfaction of charge.

³ The period of eight years is to be considered from the date of redemption of the debentures.

- c) The Company shall maintain all communications to the Board and the committees of the Board with regard to calling of meetings for a period of not less than 3 years.
- d) Further, in case an employee believes, or the Company requires that, Company records are relevant for litigation, current or potential, then these documents need to be maintained for a period as may be required by the legal department of the Company.

MODE OF PRESERVATION OF DOCUMENTS:

The documents specified in paragraph 2 above, may be kept in electronic mode.

REVIEW OF THE POLICY:

The Board and the relevant Board committee will review this Policy on a regular basis to ensure its effectiveness and compliance with the provisions of Applicable Laws which may include local, state or central legislations that may be promulgated from time to time.

DISCLOSURE POLICY:

This policy shall be uploaded on the website of the Company at www.onwardgroup.com and a weblink thereto shall be provided in the annual report of the Company.
