

ALPHAGEO (INDIA) LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

I. INTRODUCTION

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereafter referred to as “SEBI (LODR) Regulations” or “Regulations”] imposed certain obligations and disclosure requirements on all the listed entities, one of the common obligation for all the listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents.

In terms of Regulation 9 of the SEBI (LODR) Regulations, the Board of Directors (the “Board”) of Alphageo (India) Limited (AGIL) has adopted this Policy at its meeting held on November 12, 2015, for Preservation of Documents, as required under applicable regulations. This Policy is effective from December 01, 2015.

II. SCOPE

The Policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

III. OBJECTIVES

To determine preservation period for records/documents based on their reference value and legal requirements. The following aspects are considered while arriving at the preservation period:

- Company's own information retrieval needs (reference value)
- Statutory requirements under respective statutes.
- Litigation requirements
- To ensure easy retrieval.
- To ensure that unwanted records do not occupy storage space.

IV. GUIDELINES

Regulation 9 of SEBI (LODR) Regulations, the policy classifying documents in at least two categories as follows –

- 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;

Accordingly, the company has classified the preservation of documents* to be done in the following manner:

Category & Description	Period of Preservation
Records/documents with short reference value – i.e. Records, which are to be preserved for a short period for enquiry, evidence, verification, evaluation, etc.	Less than 8 years
Records/documents required to be maintained as per statutory requirements and having higher reference value – i.e. records having contractual/legal implications, which need to be preserved for a prescribed periods per statutory requirement; and records, which need to be,	Documents to be preserved for a period of 8 to 12 years

preserved for a particular period according to Company's own reference needs.	
Records which will have a permanent value for the Company even after the expiry of legal preservation period.	Permanent
Records which are required for adducing evidence in judicial or quasi judicial or other dispute redressal forum	Till the time the matters are finally disposed of.

Notwithstanding the general guidelines, care should be taken by the respective departments to ensure that records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi judicial for a and other mediation and alternate dispute for a, industrial disputes, etc. are preserved according to specific needs and even beyond the prescribed period.

Also, in the case of statutory records such as licenses, certificates, sanctions, approvals, etc. from Government/ Statutory Bodies, care should be taken to maintain and preserve the records in accordance with the specific guidelines/instructions, if any, by the issuing authority.

V. MODE OF PRESERVATION

The Documents may be preserved in

- a) Physically Form; or
- b) Electronic Form.

VI. RESPONSIBILITY

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

VII. PRESERVATION LOCATION

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.

VIII. DESTRUCTION OF RECORDS

The records/documents preserved shall be reviewed every year or according to need by the respective department and action taken to destroy those records which are due for disposal.

IX. POLICY REVIEW

The Policy shall be reviewed from time to so that the Policy remains complaints with applicable legal requirements. The Company Secretary will keep the Policy updated as per applicable statutory guidelines.

*** Note:** An indicative list of the Documents and the time-frame of their preservation is provided in Annexure.

Indicative list:

I. PERMANENT PRESERVATION:

- a. Common Seal
- b. Minutes books of Board, General Meetings and Committee Meetings
- c. Statutory Registers
- d. License and Permissions
- e. Statutory Forms and disclosures except for routine compliance
- f. Scrutinizers' Reports
- g. Register of Members
- h. Index of Members

II. TEMPORARY PRESERVATION UPTO 8 YEARS:

- a. Board Agenda and supporting documents
- b. Attendance Register
- c. Office copies of Notice of General Meeting and related papers
- d. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers
- e. All notices pertaining to disclosure of interest of directors
- f. Instrument creating a charge or modification
- g. Books of accounts, financial statements etc.
- h. Register of debenture holders or any other security holders.

III. OTHERS:

As per applicable law