



**POLICY FOR PRESERVATION OF DOCUMENTS**

(Pursuant to Clause 9 of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015)

**Introduction**

Clause 9 of The SEBI (Listing obligation and Disclosure Requirements) Regulations, 2015 make it Mandatory to have a Policy for Preservation of Documents Approved by Board of Directors.

**1. Objectives \ Purpose**

The Purpose of this Policy is to Preserve the Prescribed Document:

- Documents whose preservation shall be permanent in nature.
- Documents with preservation period of not less than eight years after completion of the relevant transactions.

**2. Scope**

This policy applies to all documents generated by the employees of the company with the scope of their activity. These documents are not the property of the employees of the company.

**3. Responsibility for Preservation of Documents.**

The head of respective Department are obligated to ensure the prevention of the documents pertaining to their area of responsibilities in accordance with the applicable Law \ regulation in consultation with the head of legal.

**4 Rules for Prevention of records**

1. List of Document required for the Preserved Permanently as per Annexure I and Documents Preserved for period of not less than 8 years after the Completion of transaction as per Annexure II.
2. In Addition, the board or Committee so Authorised for the Purpose may make such Amendments and alterations to this list as may be found expedient or necessary to comply with the relevant Provision of the law.





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3. The lists are not exhaustive and this Policy shall be applicable to all documents requiring preservation as per the classification under the provision of the Act, SEBI regulation or listing regulation, whether or not listed herein.
4. The Whole time director shall be responsible for ensuring the overall implementation of the policy.
5. The Documents as required to be preserved for electronic mode or\and in hard copies as may be necessary.
6. Appropriate nomenclature and or indexing shall be given to the documents for preservation for the purpose of easy identification and retrieval.

### ANNEXURE I

#### Documents required to be preserved for permanently.

The Board of the Committee so framed will have all the powers to decide necessity of preservation of documents permanently from time to time Notwithstanding anything contain herein the Act, SS-1 and SS-2 the following documents/ records maintained under the act, rules and regulation shall be preserved permanently and any document so required to be hosted on the website of the company by virtual of the act:-

- a. Financial statement, financial results audited & unaudited, duly signed annual report
- b. Annual returns filled with roc
- c. Minutes of the all General meeting, board and committee meeting
- d. Disclosure made under SEBI Insider and Takeover Regulation and the SEBI (LODR) Regulation, 2015 to the stock exchange
- e. Memorandum and Article of Association of the Company as may be amended from time to time and all corporate policies framed from time to time
- f. Shareholder and joint venture agreement







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- g. Letter of offer related to public issue, right issue, further issue, buy-back offer, etc..
- h. Voting result of the shareholder
- i. Copies of all press release and document filled with stock exchange, registrar of the companies and other regulatory authorities
- j. Statutory registers are required under companies act, 2013
  1. Register of member and index of member
  2. Register of duplicate and renewed share certificate
  3. Register of charge
  4. Particulars of loans and guarantees given, Securities provided and acquisition made.
  5. Register of investments.
  6. Register of investments in securities not held in the name of the company.
  7. Register of contracts in which directors are interested
  8. Register of directors, Managing director, Manager and secretary
  9. Board and committee meeting minutes
  10. Minutes of general meeting
  11. All documents and information as originally filed with the ROC for incorporation of the company
  12. Memorandum & articles of association
  13. Any others, if board of directors may deem think fit.





ANNEXURE II

Documents required to be preserved for a period of not less than eight years on completion of relevant transactions:

1. Notices of the Board meeting given to the stock exchange for considering matters relating to pre-intimation required to be submitted to stock exchange.
2. Date for the book closures and record dates for various purposes as may be decided by the company time to time
3. Quarterly and half yearly and annual financial results of the company.
4. Quarterly shareholding pattern including details for pledge of shares and any changes therein.
5. Result of the E-voting, General meeting, postal ballot, ballot papers, scrutinizer reports etc.
6. List of unpaid dividend to the shareholders.
7. Change the constitution of the board of directors, KMP, Compliance officer, Auditors, secretarial auditors, and share transfer agent.
8. Agreement with the share transfer agent, Depositories.
9. Any Price sensitive information's given or provided for the stock exchange under regulation 30 of the SEBI (LODR) Regulations, 2015.
10. Recommendation and payment of dividend of the shareholders
11. Details of the complaints received and resolved by the company i.e. Statement under grievance redressal Mechanism
12. Corporate governance report submitted to the stock exchange on quarterly and annually basis.
13. Copy of the order issued by the SEBI or stock exchange relating to securities listed with stock exchange
14. Statement of deviation or variation in use of issue proceeds





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15. mail : [apollofin@hotmail.com](mailto:apollofin@hotmail.com)

15. Compliance certificate to the exchange about the share related activities maintained by RTA registered with SEBI
16. Compliance certificate w.r.t. transfer or transmission or transposition of securities within 30 days
17. Listing fees
18. Disclosure under code of internal procedure and conduct for regulating, monitoring and reporting of trading by insiders
19. Disclosures received by the company under SEBI (SAST) Regulation, 2011
20. Statutory Registers as required under Companies Act, 2013
  - Registers of Debenture holders or any other security holders
  - Registers of Deposits
  - Register of Buy-back of securities.
  - Books of Accounts and documents
  - Declaration of director
  - Forms filed with ROC/MCA
  - Instruments creation of charge and modification thereon.

The Documents Specified annexure I and annexure II shall be kept either in Physical or in electronic mode, any documents where preservation period is not prescribed under governing laws shall be preserved for a minimum period of eight years.

Further, Board can decide from time to time to use any of the following method For preservation of documents and records as referred above.

1. Department \ Function wise
2. Subject \ Topic wise
3. Chronologically







Preservation other documents and records

Subject to Annexure I and II above, The retention of the documents identified below and of documents not included in the indented categories should be determined primarily by the application of the general guideline affecting documents retention identified above, as well as any other pertinent factor as seeing overseeing authorized as deem fit.

1) Tax and Accounting records.

Tax records include, but may not be limited to, document concerning payroll, Expenses, proof of deduction, Business cost, Accounting procedures, and any other document concerning the company's revenue and expenses including capital expenditure. Tax record should be retained for at least eight year from the date of filing the application return or such period of time as prescribed under Tax laws whichever is later.

2) Employment records and personal records.

-Labours laws require the company to maintain certain recruitment, Employment and personnel information. The company should also maintain personnel files that reflect performance reviews if any and any complaint brought against of the company or individual employees under applicable labours laws. The company should also keep all final memorandum and correspondence reflecting performance reviews and action taken by or against personnel in the employee's personnel files.

- Employment and personnel records shall be preserved for a minimum period of eight years irrespective of whether such employee continues to be employed with the company or not.

- Individual employee files need to be maintained as long as the concerned individual remains an employee of the company as also for a minimum period of 8 years whichever is later.





3) Legal Files \ Documents.

All legal document \copies of notices \summons\orders\Judgements and all other legal documents shall be preserved permanently. Documents like leases, leave and licence agreements and other documents shall be preserved for the at least 5 years beyond the life of the said documents. All licenses and property records shall be preserved permanently

3) Development \Intellectual property and trade secrets.

Development documents are often subject to intellectual property protection in their final form (E.g. patents and copyright). The Documents detailing the developments process are often also of value of the company and are protected as trade secrete where the company.

- a) Derives independent economic value from the secrecy of the information: and
- b) The company has taken affirmative steps to keep the information confidential.

The company should keep all Documents designed as containing trade secrets information for at least the life of the trade secrets.

4) Contracts:

Final, Execution copies of all contracts entered into by the company should be retained. The company should retain copies of the final copies of the final contracts for at least 5 years beyond the life of the agreement, and longer in the case of publicly filed documents.

5) Electronic mail:

E-mail that need to be saved should be either.

- a) Printed hard copy and kept appropriate file or
- b) Downloaded Computer file and keep electronically or on disk as a separate file so as to ensure its timely retrieval







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6) Insurance record

Insurance policy / renewal certificate / insurance claim shall be preserved 8 years from lapse of policies/ settlement of claim

7) RBI Records

RBI Records preserved 8 years after the compilation of the relevant transaction or as required by RBI Act/ Circulars from time to time.

Manner of public disclosure of record published on website of the company:

The Documents required to be published on the website of the company shall be posted under "Investor relations" section of website still the stipulated period of time as provide under the applicable laws in force or for longer period as board may decide from time to time.

AUTHORIZED FOR MONITORING THE POLICY

Mr. Anju Innani, Managing Director is authorised by the Board for monitoring the policy. The authorised person shall inform its Board of Directors about the monitoring of the policy. The authorised person shall take necessary steps to discharge his duty. Any Documents/Records shall be made accessible to all concerned employee of the Company and any other outside users not belonging to Company only with permission of respective departmental head. All the Directors/CFO/CEO/CS shall have full access of all records / documents of the company.

PRESERVATION PRINCIPLES:

It is only thought preservation that continues availability and access to the items in the collections can be maintained. The following principles shall be kept in mind:-

Where possible, documents are preserved in their original format, respecting the physical integrity and authentication of original documents.







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Active conservation is employed when appropriate to prevent further deterioration or damage to an item, or to enable access to be given.

Appropriate conservation measures will take into accounts the needs, values, significance, and usage of the item in question.

Surrogate shall be created where appropriate to project the original, and to allow wider access to the content surrogates shall not replace the original, which will still need preservation.

All staff is made aware of the paramount impotence of preservation, and are trained on safe handling of documents.

### **SECURITY AND PRESERVATION OF DOCUMENTS:**

The Board shall ensure that all the documents shall keep in safe place in the Company premises. The Board may authorize person for the security of the documents, who shall be responsible for safe custody of documents.

### **SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS:**

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning of the Company or Commencement of any litigation against the company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the Legal counsel determine otherwise. The Top Management in such case shall inform the entire employee by mail under "User List" of the need to retain the documents and suspension of disposal of the same.

### **DISPOSAL OF DOCUMENTS:**

Disposal of documents after said period of 8 years (whose preservation shall not be permanent in nature) shall be done in the presence of Authorized



