



## **ABANS ENTERPRISES LIMITED**

### **PRESERVATION OF DOCUMENTS AND WEB ARCHIVAL POLICY**

<b>Adopted by</b>	<b>Board of Directors on 11-12-2015</b>
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**Abans Enterprises Limited**  
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## PRESERVATION OF DOCUMENTS AND WEB ARCHIVAL POLICY

### I. PREAMBLE

Abans Enterprises Limited (AEL) believes that a good record keeping program is fundamental to the Company's commitment to administrative transparency and accountability. The purpose of Policy on preservation of Records ("Policy") is to ensure that necessary records and documents of the Company are adequately protected and maintained and to ensure that records that are no longer needed by the company or are of no value are discarded at regular interval.

The Company understands that records form an essential and significant part of the Company's resources.

The Preservation of Documents and Web Archival Policy ("Policy") is in pursuance to Regulation 9, 30 and 46 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), on preservation of the Documents to aid the employees and officers of the Company in handling the Documents efficiently. This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation disposal and keeping a record of the same and archival of documents uploaded on the website of the Company.

### II. OBJECTIVE

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Listing Regulations and as per Policy framed in compliance thereof to ensure that the records no longer needed or which are of no value or are redundant are discarded after following due process for the same.

The major objectives of the policy are:

- a. To identify statutory records to be maintained and preserved.
- b. To identify records to be maintained physically/ electronically/ on the website either for a period of eight years / five years/ other applicable period or permanently.
- c. To decide the mode of preserving the documents, whether in physical form or in electronic form.
- d. To decide the procedure to destroy the documents after eight years or other applicable period.
- e. To help employees understand their obligations in retaining and preserving the documents and records.

### III. DEFINITIONS

**"Authorised Person"** means any person included in the definition of Senior Management under Section 178 of the Companies Act and provisions of SEBI (Listing Obligations and Disclosure Requirements), 2015

**"Board"** means Board of Directors of the Company.

**"Company"** means "Abans Enterprises Limited"

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

**"Document"** as per Section 2(36) of the Companies Act 2013 includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

**“Electronic Record(s)”** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

**“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.

**“Maintenance”** means keeping documents, either physically or in electronic form.

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

**“Preservation”** means to keep in good order and to prevent from being damaged or destroyed the Documents which may be preserved in (i) Physical Form or (ii) Electronic Form. The person responsible for compliance of applicable laws and in his absence the person so authorized by the Board for the purpose shall be responsible for preservation. He shall have custody of the documents which shall be kept under lock and key. Upon the said person ceasing to be responsible for preservation and custody, he shall hand over the documents to the next person authorized by the Board of Directors. The documents and records so preserved should be easily accessible and retrievable with appropriate back up measures in case of preservation in Electronic Form.

**“Register”** means documents and records required to be maintained under:

- a. The Companies Act, 2013 and Rules made there under
- b. SEBI Regulations
- c. Secretarial Standards
- d. Any other applicable law for the time being in force.

**“Records”** means documentary evidence of past events or transactions.

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

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

#### **IV. INTERPRETATION**

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013, and/or Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

#### **V. CLASSIFICATION**

The preservation of Documents shall be done in the following manner:

- a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for that period which is prescribed by Applicable Law.
- b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is covered under the definition of current documents.

## **VI. PRESERVATION OF DOCUMENTS**

### **1. Documents whose preservation shall be permanent in nature:**

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently. Details of documents whose preservation shall be permanent in nature is listed in Annexure –A.

### **2. Documents with preservation period of not less than eight years / other period after completion of the relevant transactions :**

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a period of not less than eight years / other period after completion of the relevant transactions shall be preserved accordingly. Details of documents with preservation period of not less than eight years after completion of the relevant transactions is listed in Annexure – B.

### **3. Documents with preservation period other than those mentioned in (2) above :**

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in 1 & 2 above shall be preserved accordingly.

## **VII. DESTRUCTION OF DOCUMENTS**

The period stated above is minimum retention/ preservation period. Prior to actual destruction/ disposal in terms of this policy, the retention schedule may be reviewed by the Authorised Person if required due to an on-going business use, internal audit requirement, income tax assessments including appeals, inquiry / investigation under applicable laws or any other like reason. The documents and records shall be destroyed only after ascertaining that they are not required and have become redundant.

The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period by the Authorised Person in whose custody the Documents are stored, is completed.

A register of the Documents disposed/ destroyed in prescribed format (Annexure-C) shall also be maintained stating therein the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction. The entries in the register shall be authenticated by the Authorised Person.

## **VIII. SUSPENSION OF DISPOSAL OF DOCUMENTS IN THE EVENT OF LITIGATION OR CLAIM:**

In the event that the Company is served with a notice for providing documents to a statutory authority or any litigation proceedings are commenced by or against the Company, the disposal of documents which are subject matter of such notice/ litigation shall be suspended until the matter is settled, resolved or disposed off. The Compliance Officer of the Company shall immediately inform all the employees of the Company about such suspension of disposal of documents.

## **IX. MISCELLANEOUS**

The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

## **X. WEBSITE DISCLOSURES AND ARCHIVAL**

Regulation 30(4) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the 'Listing Regulations') requires every listed entity to frame a policy for determination of materiality of events and information that requires appropriate disclosure to the stock exchanges. Further such disclosures are required to be hosted on the website of the listed entity for a minimum period of 5 years and thereafter as per its Archival Policy.

-The event / information disclosed to the stock exchanges under this Policy shall also be placed on the website of the Company for a minimum period of five years or for such other period, if the period prescribed shall be more than five years by the Listing Regulations and /or the Securities Laws as defined in the Listing Regulations.

-After completion of the minimum period of five years or such other period as prescribed by the Listing Regulations and/or Securities Laws the events or information shall be archived by the Company for a further period of three years.

-Thereafter, such events or information may ceased to be displayed on the website of the Company.

## **XI. AMENDMENTS**

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision/amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

## **XII. POLICY REVIEW**

In the event of any variation or inconsistency between the provisions of the Policy and applicable law, the provisions of the applicable law shall prevail over the Policy and the provisions of the Policy shall be deemed to have been amended so as to be read in consonance with such applicable law. As this Policy is pursuant to applicable laws, if any, and if any change in applicable laws or interpretation thereof necessitates any change to the Policy, this Policy shall be read so as to incorporate the changes.

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**Annexure–A****Documents/Record whose preservation shall be permanent in nature**

<b>Sr. No.</b>	<b>Documents/Records</b>
1.	Certificate of Incorporation
2.	Memorandum and Articles of Association, including all alterations therein in chronological order
3.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
4.	Minute Books of General Meetings and resolutions passed by postal ballot, Board and Committee Meetings as per Companies Act, 2013 and resolutions passed by circulation
5.	Register of Directors & Key Managerial Personnel
6.	Register and Index of Members, or other security holders, if any
7.	Register of renewed and duplicate share certificate, if any
8.	Foreign register of members
9.	Register of Contracts or Arrangements in which Directors are interested as per Companies Act, 2013
10.	Register of Charges as per Companies Act, 2013
11.	Register of Loans and Investments by Company as per Companies Act, 2013
12.	Register of Investments not held in its own name by the Company as per Companies Act, 2013
13.	Files relating to premises viz. Title Deeds/Lease Deeds of owned premises/land and building, etc. and related Ledger/Register
14.	Licenses, approvals, permissions, deed of indentures, mutation certificates, IPR's certificates and their renewals from time to time or any other document which the Managing Director thinks expedient to preserve.
15.	Policies of the Company framed under various regulations
16.	Statutory forms and disclosures except for routine compliance
17.	Scrutinizer's report
18.	Annual Reports
19.	Such other records as may be required under any law from time to time

**Documents / Record to be preserved for a minimum period of Eight Years**

<b>Sr. No.</b>	<b>Documents/Records</b>
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Annual Returns as per Companies Act, 2013
3.	Register of Deposits as per Companies Act, 2013
4.	Register of Application and Allotment as per Companies Act, 2013
5.	Register of Debenture Holders, if any as per Companies Act, 2013
6.	Attendance Register of Board/Committee Meetings of the Company
7.	Office copies of Notices, Agenda, Notes on Agenda and other related paper of Meetings of the Company
8.	Annual financial statements including Annual accounts, Directors report and Auditors report
9.	Books of accounts including Vouchers / Voucher register as defined under the Companies Act, 2013
10.	Income Tax Returns filed under Income Tax Act, 1961
11.	All notices in form MBP – 1 received from Directors and KMPs along with any amendment thereto
12.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
13.	Copy of newspaper advertisement or publications
14.	Compliance Reports received from any statutory authority
15.	The postal ballot and all other papers or registers relating to postal ballot including voting by electronic means
16.	Disclosure/Return filed under SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015
17.	Audio recordings, video recordings, if any, and transcripts of post earnings or quarterly calls held with investors
18.	Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents
19.	Group Insurance Plans & Policies
20.	Bank Statement and Cancelled Cheques
21.	Employee Expense Reports and other Employee Records
22.	Foreign Register of debenture holders or any other security holders
23.	Such other records as may be required under any law from time to time