

CREATIVE EYE LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

[Pursuant to Regulation 9 of the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015]

Background:

Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 requires every listed company to formulate a policy on preservation of Documents which has to be approved by Board of Directors.

In this context, the following policy has been framed by the Board of Directors of Creative Eye Limited at its meeting held on 28th May, 2016 with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation.

This policy can be modified and or amended with the approval of the Board of Directors only.

EFFECTIVE DATE:

This policy is effective from 1st December, 2015

DEFINITIONS:

1. **"Board of Directors" or "Board"**
Board of Directors or Board shall mean the Board of Directors of Creative Eye Limited, as constituted from time to time.
2. **"Company"**
Company shall mean "Creative Eye Limited".
3. **"Documents"**
Documents shall mean all papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers records, files, books, tapes, CDs, DVDs, electronic storage devices etc, and like as required to be maintained under any law or regulation for the time being in force.
4. **"Listing Regulations"**
Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.
5. **"Maintenance"**
Maintenance shall mean keeping Documents, either physically or in Electronic form.

6. "Preservation"

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

OBJECTIVE/ PURPOSE OF POLICY:

This policy sets the standards for managing, storing and preservation of documents of the Company which are broadly classified in the following two categories:

(a) Documents whose preservation shall be permanent in nature (listed in Annexure subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

(b) Documents with preservation period of not less than eight years after completion of the relevant transactions (listed in Annexure-2) subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

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, for the time being in force.

MODE OF MAINTENANCE:

The Company shall maintain these records either in physical or electronic mode. The applicable provision of law, rules and regulations with regard to electronic maintenance of records shall be adhered to.

All the records shall be maintained as per the prescribed formats , if any, as amended from time-to-time under the various rules and regulations.

ROLES & RESPONSIBILITIES:

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

DISPOSAL AND DESTRUCTION OF DOCUMENTS:

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s).

This applies to both Physical and Electronic Documents.

COMMUNICATION AND DISSEMINATION OF THE POLICY:

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors.

GENERAL :

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

AMENDMENTS :

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

Annexure 1

Documents whose preservation shall be permanent in nature

Sr. No.	Nature of Documents
1.	Common Seal and the original signed and stamped memorandum of Association and the Articles of Association of the Company.
2.	Minutes Books of Board, General Meetings and Committees Meetings
3.	Statutory Registers
4.	Scrutinizers Reports
5.	Register of Members along with index
6.	Register of Directors and KMP.
7.	Foreign Register of members if any
8.	Licenses & Statutory Approvals
9.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
10.	Material Agreements/Contracts
11.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.
12.	Investments Documents / Proofs including certificate

Annexure 2

Documents with preservation period of not less than eight years after completion of the relevant transactions

Sr. No.	Nature of Documents
1.	Books of Accounts
2.	Annual Returns
3.	Disclosure of the Director interest received from the directors of the Company in the manner prescribed.
4.	Attendance Register, Notices, Agenda, Notes on agenda and other related papers of General meeting, Board meetings and Various Committee meetings.
5.	Press Releases.
6.	Changes to the MOA and AOA , if any.
7.	Vouchers / Voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013.
8.	Income Tax Returns filed under Income Tax Act, 1961
9.	Copy of newspaper advertisement or publications
10.	Correspondences with Departments/ shareholders
11.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.
12.	Non-Statutory Registers/ Documents