

THE INDUSTRIAL & PRUDENTIAL INVESTMENT CO. LTD.

Regd. Office :

125, Maker Chambers III, Nariman Point,
Mumbai - 400 021 • Telephone : 2285 4243
Email : indpru@vsnl.net

Ref: 160009-0216

Date: February 11, 2016

TO
MS. BHUVANA SRIRAM
Relationship Manager,
Corporate Relationship Department,
BSE Limited,
Rotunda Building,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort
MUMBAI - 400 023.

Dear Sirs,

Ref: COMPANY CODE: 501298

Sub: *Policy on preservation of documents*

Pursuant to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Board of Directors of the Company have adopted the above policy.

The same will be placed on the website of the Company.

Thank you,

Yours faithfully,

For **THE INDUSTRIAL & PRUDENTIAL INVESTMENT CO. LTD.**

(A. V. SETALVAD)
CHAIRMAN

Encl: As above.

THE INDUSTRIAL & PRUDENTIAL INVESTMENT CO. LTD.

CIN: L65990MH1960PLC000374

POLICY ON PRESERVATION OF DOCUMENTS

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

PURPOSE OF POLICY

The Records of the Company are to be preserved and managed so as to ensure easy accessibility whenever required.

DEFINITIONS

- i. **“Company”** means “The Industrial & Prudential Investment Co. Ltd.
- ii. **“Board”** means the board of directors of the Company;
- iii. **“Listing Regulations”** means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- iv. **“Policy”** means this Policy of Preservation of Documents of the Company;
- v. **“Records”** in relation to this policy includes accounting records, “book and paper” and “book and paper” as defined in sub-section 12 of section 2, books of account as defined in sub-section 13 of section 2 of the Companies Act, 2013 and statutory and other documents of material significance.

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations framed by the Securities Exchange Board of India or any other relevant regulation/legislation applicable to the Company.

OBJECTIVE OF POLICY

- a) Effective corporate governance;
- b) Effective information management;
- c) Systematic disposal/destruction of Company’s non-current records that have outlived their administrative usefulness.

SCOPE OF THE POLICY

For the purpose of achieving the above objectives, the documents covered as per this Policy have been divided into two sections, i.e. permanent records and the records for the period of at least 8 years. This Policy applies to the records maintained by the Company in any format or medium. The records which are not required to be retained permanently shall be disposed off according to this Policy.

AUTHORITY AND RESPONSIBILITY

Pursuant to the Listing Regulations, this Policy has been established and formulated by the Board.

The Company Secretary and Chief Financial Officer of the Company, shall be responsible to deal with the records according to the time frame prescribed in the Policy for their preservation.

All staff and management of the Company shall assist in implementing this Preservation Policy as appropriate to their respective roles and responsibilities.

CLASSIFICATION OF RECORDS

- I. Permanent Records - Annexure A
- II. Records to be preserved for 8 years – Annexure B

Following aspects have been considered

- (a) Compliance with statutory and regulatory requirements.
- (b) Requirements of SEBI/RBI/MCA officials to have access to certain records.
- (c) Requirements of internal and external auditors to have access to certain records.

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.

LOCATION OF RECORDS

As mandated by the Companies Act, 2013 or under any other statute, certain records shall be located at the registered office of the Company. The records for which no specific place has been specified under any statute may be maintained at any other place as may be, decided by the Board of Directors considering their utilization and usefulness.

RECORD APPRAISAL

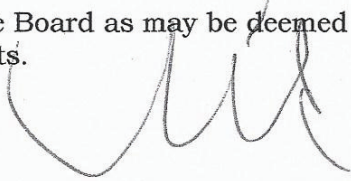
The Company shall at regular intervals carry out the appraisal of the records preserved as per this Policy. The appraisal of records shall be undertaken only after the approval of the Company Secretary and Chief Financial Officer of the Company .

COMPLIANCE OFFICER:

The Company Secretary of the Company shall be the Compliance Officer of the Company.

REVIEW OF THE POLICY

This policy shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments.



Chairman

ANNEXURE - A

Records to be preserved permanently

Item No.	Records
1.	Certificate of Incorporation
2.	Memorandum and Articles of Association
3.	Agreements made by the Company with Stock Exchanges, Depositories, etc.
4.	Minute Books of General Meetings, Board and Committee Meetings as per Companies Act, 2013
5.	Register and Index of Members, debenture-holders, if any or other security holders, if any
6.	Register of Contracts as per Companies Act, 2013
7.	Register of Charges as per Companies Act, 2013
8.	Register of Investments as per Companies Act, 2013
9.	Documents relating to premises
10.	Authorization / licenses obtained from any statutory authority
11.	Policies of the Company framed under various regulations
12.	Register of disposal of records
13.	Certificates obtained from various statutory authorities
14.	Such other records as may be required under any law from time to time

ANNEXURE -B

Records to be preserved for minimum period of eight years

Item No.	Record
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Register of Inter Corporate Loans and Investments as per the Companies Act, 2013
3.	Annual Returns as per Companies Act, 2013
4.	Register of Deposits as per Companies Act, 2013
5.	Register of Allotment (from the date of each allotment) as per Companies Act, 2013
6.	Annual financial statements including: - Annual accounts -Directors report -Auditors report
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.	All notices in form MBP – 1 received from Directors and KMPs alongwith any amendment thereto
10.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
11.	Copy of newspaper advertisement or publications
12.	Records relating to Court Cases / CBI Cases / Police Cases/ Civil Suit/Labour Court Cases/Arbitration Cases
13.	Compliance Reports received from any statutory authority
14.	Correspondences made with any statutory authority
15.	Register of Power of attorneys, if any
16.	Forms and returns filed with RBI/MCA or with any other statutory