KALYANI COMMERCIALS LIMITED

RECORDS AND ARCHIVES MANAGEMENT POLICY

[Pursuant to Regulation 9 and 30(8) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015]

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PURPOSE

The Board of Directors ("the Board") of Kalyani Commercials Limited ("the Company"), has adopted this Records and Archives Management Policy ("the Policy") to establish the framework needed for effective preservation/ maintenance of documents and records of the Company required to be maintained under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Listing Regulations").

Should there be any inconsistency with the requirement of policy of the Company, the requirements of the Listing Regulations shall prevail.

DEFINITIONS

a. **Archive:** The whole body of records of continuing value of an organisation or individual. Sometimes called 'corporate memory'.
b. **Archives:** Those records that are appraised as having continuing value.
c. **Electronic records:** Records communicated and maintained by means of electronic equipment.
d. **Listing Records:** Documents/records required to be prepared and disclosed to the stock exchanges pursuant to the Listing Regulations, 2015.
e. **Records:** Records information in any form including data in computer systems, created or retrieved and maintained by an organisation or person in the transaction of business or the conduct of affairs and kept as evidence of such activity including listing records.

OBJECTIVE

The objective of this Policy is to ensure that the records, whether physically or in electronic form be preserved for a minimum period of 8 years from the date of completion of relevant transaction.

Provided, records comprising of Memorandum of Association, Articles of Association, Minutes of Board Meeting and its committee shall be preserved permanently.

Further, if any other applicable law requires the preservation of any of these Listing Records for a longer period or permanently, then those shall be preserved / maintained accordingly.

POLICY FOR PRESERVATION / MAINTENANCE

The Records created in physical form shall be scanned and maintained in electronic form as well. The electronic communication shall be maintained on the Company server in year wise folders.

Further, the safety of the Listing Records in electronic form is to be achieved as per the relevant IT policy of the Company whereas the physical record shall be in the custody of the Company Secretary.

The Listing Records shall be preserved for a minimum period of 8 years from the date of completion of relevant transaction.

SECURITY

The records shall be stored in conditions that are clean and secure, with low risk of damage from fire, water, dampness, mould, insects and rodents. They should also be kept away from direct sunlight and other sources of light and heat. The storage area should be well ventilated and ideally maintained at a stable temperature and humidity.

The records shall be preserved / maintained at the Registered Office of the Company unless any other law requires it to be maintained at the Registered Office or any other place, in which case the same shall be kept at such place.

RIGHT TO ACCESS / RETRIEVE

Records must be made accessible to only authorised users. Officers of the Company enacting the normal course of their duties must have access to relevant records of the Company.

DISPOSAL AND DESTRUCTION OF RECORDS

Staff may only destroy or dispose of records in accordance with the written authorization from the head of the department of which records relate to.

Where records are scheduled for destruction, this should be undertaken by methods appropriate to the confidentiality status of the records. All records approved and eligible for destruction must be destroyed under confidential conditions, unless the material is widely published. If staff are uncertain of the status of a record, it should be treated it as confidential and destroyed under confidential conditions.
Confidential records should be destroyed as follows:

- **DESTRUCTION OF PAPER RECORDS**

Paper records must be placed in security bins. They must never be placed in unsecured bins or rubbish tips.

- **DESTRUCTION OF OPTICAL MEDIA**

Records held on optical media such as rewritable disks must be destroyed by cutting, crushing or other physical means. Deleting files from optical media is not sufficient to ensure the destruction of the records. Backup copies of the records must also be destroyed.

ARCHIVAL POLICY

The Company shall ensure that all the information disclosed on the Company's website) is maintained live and in archive for a period of 5 years.

PERSON RESPONSIBLE

The Company Secretary shall be responsible for ensuring compliance under this Policy

AMENDMENT

This Policy shall not be amended unless the amendment is approved by the Board of Directors or unless such amendment is required pursuant to change in the applicable law.

Title: Records and Archives Management Policy	**Approved By:** Board of Director **Date:**
Officer Responsible: Company Secretary	**Contact Officer:** Company Secretary