

TRANS FREIGHT CONTAINERS LIMITED

**POLICY ON PRESERVATION OF DOCUMENTS & ARCHIVAL
OF DOCUMENTS**

Policy on Preservation of Documents & Archival of Documents

PREFACE

The Board of Directors (the “Board”) of Trans Freight Containers Limited (the “Company”) has adopted the following policy with regard to preservation and disposal of documents/records maintained by the Company either in physical Mode or electronic mode (hereinafter referred to as “the Documents”).

This Policy has been formulated in accordance with Regulation 9 and 30(8) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. This Policy shall be known as “Policy for Preservation of Documents and Archival of Documents”.

DEFINITION

“Act” shall mean the Companies Act, 2013.

“Board of Directors” or “Board” shall mean the Board of Directors of Trans Freight Containers Limited as constituted from time to time.

“Company” Company shall mean “_Trans Freight Containers Limited”.

“Documents” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc. and the like as are required to be maintained under any law or regulation for the time being in force.

“Listing Regulations” shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

OBJECTIVE

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

A. The documents of a permanent nature (listed in *Annexure 1*) shall be maintained and preserved permanently by the Company 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. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in *Annexure-2*) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions 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 in clauses A and B above in an electronic mode.

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PRESERVATION OF DOCUMENTS:

The Documents may be preserved in physical form or Electronic Form. The Authorized Person is expected to observe the compliance of requirements of Applicable Law. The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents. The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

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 of Documents:

The documents shall be destroyed after the relevant or prescribed period, by the Authorized Person in whose custody the documents are stored, after the prior specific approval of the Key Managerial Officers of the Company or any other person authorized by the Board of Directors from time to time and as per Applicable Law pursuant to which the documents have been preserved. The details of the documents destroyed by the Company shall be recorded in the Register of Disposal of Records to be kept by Employees who are disposing of the document in the format prescribed in ***Annexure III***.

COMMUNICATION AND DISSEMINATION OF THE POLICY

This policy should be added with other HR related policies for all new Employees. For all existing Employees and Directors, a copy of this policy shall be posted on the web-site of the Company.

WEB ARCHIVAL POLICY

- The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s) effective December 01, 2015.
- Such disclosures shall be retained on the website of the Company for a minimum period of five years.
- At the end of the fifth year the information shall be archived and preserved for a further period of three years.

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Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

Annexure 1

DOCUMENTS FOR PERMANENT PRESERVATION

- Registration Certificate.
- Memorandum & Articles of Association.
- Licenses, Statutory Approvals, Permissions.
- Statutory Registers required under applicable laws.
- Audited Financial Statements.
- Minutes of General Meetings, Board Meetings and various committees Meetings.
- Material Agreements/ Contracts.
- Investment Documents/proofs including certificates etc.
- Orders issued by Courts/ Statutory Bodies.
- Scrutinizers' Reports.
- Policies and codes of the Company.
- Any other documents as may be required to be maintained permanently in terms of applicable law(s), and as maintained and preserved from time to time.

Annexure 2

DOCUMENTS FOR PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS

- Annual Reports.
- Annual Returns.
- Books of Accounts and financial statements etc.
- Circular Resolutions.
- Insurance Policies/ Claims under various policies.
- Correspondence with Departments/ Shareholders.
- Non-Statutory Registers/ Documents.
- All notices pertaining to disclosure of interest of Directors.
- Any other document as may be required to be maintained in terms of applicable law(s), maintained, and preserved from time to time.

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Annexure 3

Format of the Register of Documents disposed/destroyed-

Sr. No.	Particulars of Documents alongwith provision of applicable law	Date and Mode of Destruction	Initials of the Authorised Persons