

POOJA ENTERTAINMENT AND FILMS LIMITED
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POLICY ON PRESERVATION OF DOCUMENTS

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POOJA ENTERTAINMENT AND FILMS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

1. BACKGROUND:

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) requires every Listed Company to formulate a policy on Preservation of Documents which has to be approved by the Board of Directors.

In this context, the following policy has been framed by the Board of Directors (“Board”) of Pooja Entertainment And Films Limited.

2. OBJECTIVES OF THE POLICY

The objective of this policy is to classify the documents, records and registers of the Company which are required:

- a. To be preserved permanently.
- b. To be preserved for a period of not less than 8 years.

3. DEFINITIONS

“**Act**” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

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

“**Company**”, “**This Company**”, “**The Company**”, “**Company**” wherever occur in the policy shall mean **Pooja Entertainment And Films Limited.**”

“**Board of Director**” or “**Board**”, means the collective body of the Directors of the Company.

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

“**Maintenance**” means keeping Documents, either physically or in Electronic Form.

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

“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 .

4. INTERPRETATION

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

5. PRESERVATION OF DOCUMENTS

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

- i. Certificate of Incorporation
- ii. Certificate of Commencement of Business
- iii. Memorandum & Articles of Association
- iv. License, Certificate, Registration Documents obtained from various Statutory Bodies in India
- v. Material Agreements/Contracts.
- vi. Minutes of the Meeting of Board & its Committees
- vii. Minutes of the Meeting of Shareholders
- viii. Statutory Registers required under the provisions of Companies Act 1956 & 2013
- ix. Policies of the Company framed under various regulations
- x. Register of disposal of records.
- xi. All kinds of Court Orders
- xii. Such other records as required under any law from time to time.

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN 8 YEARS

- i. Annual Return(s)
- ii. Book Agenda and supporting Documents
- iii. Attendance register
- iv. Books of Accounts
- v. Audited Financial statements
- vi. Accounting and Corporate Tax records
- vii. Office copies of Notice of General Meeting, and related papers
- viii. Office copies of Notice of Board Meeting/ Committee Meeting, notes on Agenda and other related papers
- ix. All notices pertaining to disclosure of interest of Directors
- x. Instrument creating a charge or modification
- xi. Register of debenture holders or any other security holder

- xii. Bank records
- xiii. Employment, Employee & Payroll records
- xiv. Insurance related documents
- xv. Correspondences with Departments/Shareholders
- xvi. Non-statutory registers/Documents
- xvii. Films, Videos, CDs, VCDs, tapes etc.
- xviii. Such other records as required under any law from time to time.

6. MODES OF PRESERVATION

The Documents may be preserved in

1. Physical form
2. Electronic form

The official of the Company required to preserve the document shall be Authorised person who is generally expected to observe the compliances of statutory requirements as per applicable law.

The preservation of documents should be such as to ensure that there is no tempering, 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 the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

7. 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). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

Specimen format of the register of documents disposed of / destroyed

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON

8. 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.