

**INVENTURE GROWTH  
AND  
SECURITIES LIMITED**

**Policy for Preservation of Documents**

As per Regulation 9 of SEBI(LODR), Regulation 2015

## **INVENTURE GROWTH AND SECURITIES LIMITED**

### **Policy for Preservation of Documents**

#### **1. Preamble:**

The Securities and Exchange Board of India (SEBI) has issued and notified "SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the "Regulations") on 2<sup>nd</sup> September 2015.

The Regulations requires the Board of Directors of a company to frame a Policy for Preservation of Documents classifying them in to two categories:

- i. Documents which preservation shall be permanent (**Annexure A**); and
- ii. Documents to be preserved for not less than eight years (**Annexure B**).

The Documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognizes that documents whether in physical or electronic mode, forms an important and integral part of the Company's records. The preservation of Documents is important in order to ensure immediate access to the records, its retrieval and authentication.

Accordingly, the Board of Directors of Inventure Growth And Securities Limited (the "Company") has adopted this Policy for preservation of documents.

#### **2. Applicability:**

This Policy is applicable to all Documents maintained in physical and electronic mode by the Company.

The Documents not covered under this Policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

#### **3. DEFINITIONS:**

**"Act"** means the Companies Act, 2013 or any previous company law (to the extent the provisions there under are in force) and Rules framed there under, including any amendments, modifications, clarifications or re-enactment thereof, for the time being in force.

**“Articles”** means the articles of association of a company as originally framed or as altered from time to time or applied in pursuance of the Act.

**“Book and Paper”** and “book or paper” includes books of account, deeds, vouchers, writings, documents, minutes and registers maintained on paper or in electronic form.

**“Books of Account”** includes records maintained in respect of—

(i) all sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place;

(ii) all sales and purchases of goods and services by the company;

(iii) the assets and liabilities of the company; and

(iv) the items of cost as may be prescribed under section 148 in the case of a company which belongs to any class of companies specified under that section.

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

**“Document”** includes summons, notice, requisition, order, declaration, form and register, records, whether issued, sent or kept in pursuance of this Act or previous company law or under any other law for the time being in force or otherwise, maintained on paper or in electronic form.

**“Memorandum”** means the memorandum of association of a company as originally framed or as altered from time to time in pursuance of any previous company law or of this Act.

**“Policy”** means this Policy for Preservation of Documents

**“Listing Regulations, 2015”** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and includes any amendments, modifications, clarifications or re-enactment thereof, for the time being in force.

#### **4. Documents:**

For the purpose of this Policy the term *“Documents”* shall mean statutory records, registers, returns, forms etc required to be maintained and preserved by the Company in physical or electronic form under the Companies Act, 1956/Companies Act, 2013, Securities and Exchange Board of India Act, 1992, Securities Contracts (Regulation) Act, 1956 and the Depositories Act, 1996.

**5. Review of Policy:**

This Policy shall be subject to review, if necessary. Any change/ amendments in applicable statues with regard to maintenance and preservations of documents and records shall be deemed to be covered in this policy without any review. Any change/amendments to this policy shall be approved by the Chairman and/ or the Company Secretary. The Policy shall come into force from December 1, 2015.

**6. DESTRUCTION OF DOCUMENTS:**

The documents specified in Annexure B to this Policy, kept by the Company, may be destroyed after the expiration of the period specified in the respective Schedules. The documents not specified in the schedules shall be destroyed after the period of Eight years. However, in the case of pending matters/litigation/disputes, the documents shall be preserved till the resolution of pending matter/litigation/dispute. The documents shall be destroyed after taking the approval of respective Department Head.

**7. AMENDMENT IN POLICY:**

This Policy may be changed, amended, edited or substituted by the Compliance Officer where there are any statutory changes or other changes necessitating the change in the policy.

## **Annexure A**

### **A) Companies Act, 2013:**

- Memorandum and Articles of Association as amended from time to time.
- Register of Contracts.
- Register of Directors and KMPs and the securities held by them.
- Register of Loans and Investments made by the Company.
- Register and Index of Members.
- Minutes of the Board, Committees of the Board and General Body meetings including meeting conducted through Postal Ballots.
- Resolutions passed by Circulation.
- Various Forms and returns filed with the Authorities.
- Audited Financial Statements.

### **B) SEBI Merchant Banking Regulations:**

- Certificate of Registration issued by SEBI.

### **C) SEBI Research Analyst Regulations:**

- Certificate of Research Analyst

### **D) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:**

- Listing Agreement executed with the Exchanges.
- Trading approval relating to listing of securities.
- Offer documents for Public Issues and Private placement of securities filed with Securities and Exchange Board of India.

### **E) Depositories Act:**

- Confirmation of all Corporate Actions in respect of allotment of securities.
- Intimation on allotment of International Securities Identification Numbers (ISIN) for Securities issued.

### **F) Others:**

- Register of Records and Documents destroyed.

## **Annexure B**

### **A) Companies Act 1956 /Companies Act, 2013:**

- Register of Buy-back of Securities from the date of completion of buy-back
- Notices and Notes to agenda of the Board, Committees of the Board, General Meetings and Postal Ballots.
- Register of Charges from the date of satisfaction of respective charge.
- Register of Debentures and Debenture Trust Deed from the date of its redemption.
- Books of Accounts including vouchers and bills.
- Annual Return together with the Annexure.
- Register of Transfer and Transmission of shares/Debentures and other securities.
- Scrutinizer's Report on Postal Ballot and AGM.
- Documents relating to appointment of Managerial Personnel.
- Dividend reconciliation statement till the time the dividend is transferred to IEPF.
- ROC Forms Filed with the Ministry of Corporate Affairs.

### **B) SEBI Merchant Banking Regulations:**

- Orders, if any, passed by SEBI with respect to Merchant Banking activities.

### **C) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:**

- All reports filed with the stock exchanges from time to time.
- All disclosure of various events and Press Releases.
- Intimations of Board Meetings.

### **D) Documents filed with Stock Exchanges under SEBI Regulations**

- All disclosures and intimations filed under:
  - i) SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.
  - ii) SEBI (Prohibition of Insider Trading) Regulations, 2015.

iii) All disclosures and intimations filed under SEBI (Share Based Employee Benefit) Regulation, 2014 and SEBI (Employee Stock Option Scheme and Stock Purchase Scheme) Guidelines 1999.