

POLICY ON PRESERVATION OF DOCUMENTS

1. Background

Pursuant to Regulation 9 of Securities and Exchange Board of India (“SEBI”) (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**Listing Regulations**”), every listed company should formulate a policy on preservation of documents (“**Policy**”) which has to be approved by the board of directors.

The Board of Directors of Zircon Technologies (India) Limited (the “**Company**”), at its meeting held on **1st August, 2018** approved this Policy. This Policy will be effective from **1st August, 2018**.

2. Objectives of the Policy

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

- i. To be preserved permanently; and
- ii. To be preserved for a period of not less than 8 years.

3. Preservation of documents

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and the rules made thereunder, (the “**Companies Act**”) the Secretarial Standards, the Listing Regulations and any other law, rules, regulations as may be applicable to the Company from time to time.

The following documents are to be maintained permanently:

- (i) The original signed and stamped Memorandum and Articles of Association of the Company;
- (ii) Minutes of general meetings, board meetings and committee meetings;
- (iii) Register of members along with index;
- (iv) Register of loan, guarantee, security and acquisition made by the Company;
- (v) Register of investments not held in its own name by the Company;
- (vi) Register of contracts with related party and contracts and bodies in which directors are interested;
- (vii) Register of charges;
- (viii) Register of renewed and duplicate share certificates;
- (ix) Register of directors and Key Managerial Personnel.

The following documents are to be maintained for a period of upto 8 years:

- (i) Books of accounts;
- (ii) Annual returns;
- (iii) Disclosure of interest received from directors of the Company in the manner prescribed;
- (iv) Attendance registers, notice, agenda, notes on agendas and other related papers of general meetings, board meetings and various committee meetings;
- (v) Instrument creating a charge or modifying a charge;
- (vi) Changes to the Memorandum and Articles of Association;
- (vii) Records pertaining to tax assessment, tax filings, proof of deduction, tax returns, appeal preferred against any claim made by the relevant tax authorities;
- (viii) Employment record for the employees of the Company;
- (ix) Marketing documents;
- (x) Press releases; and

- (xi) Legal documents including but not limited to contracts, legal opinions, orders passed by various courts and tribunals, documents relating to cases pending in any court, tribunal or authority.

4. Mode of maintenance

The Company shall maintain these records either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to.

All the records shall be maintained as per the prescribed formats, if any, as amended from time to time under the various rules and regulations.

5. Destruction of records

After the expiry of the statutory retention period, the preserved documents may be destroyed. The destruction of documents as a normal administrative practise shall be followed for records which are duplicate/ unimportant or irrelevant.

This applies to both physical and electronic documents. The documents may be destroyed as follows:

- (i) Recycle non-confidential paper records;
- (ii) Shred or otherwise render unreadable confidential paper records; or
- (iii) Delete or destroy electronically stored data.

6. Amendments

The Policy can be modified or amended with the approval of the board of directors only.