

CHAMBAL BREWERIES AND DISTILLERIES LIMITED

Document Retention and Archival Policy

Background

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), **Chambal Breweries and Distilleries Limited**. (the Company) is required to formulate a policy for preservation of documents required to be maintained under the Listing Regulations in at least two categories as specified in the said Regulation. In terms of Regulation 30(8) of the Listing Regulations, the Company is required to formulate an archival policy for all disclosures of events/information to the Stock Exchanges in terms of the Company's Policy for Disclosure of Events/Information and Determining of Materiality.

Objective of the policy

The purpose of this policy is to establish the framework needed for effective preservation of documents and records of the Company required to be maintained under the Listing Regulations, in terms of Regulation 9 and also to archive any of the material of events or information which are disclosed by the Company to the Stock Exchanges prior to the period of five years in terms of Regulation 30.

Definitions -

"Board" means the Board of Directors of the Company

"Company" means Chambal Breweries & Distilleries Limited

"Document(s)" refers to documents, writings, papers, notes, agreements, deeds, contracts, summons, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record/s maintained by the Company, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper / print form or in Electronic Form and does not include multiple or identical copies.

"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.

"Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed, other than as permitted by this Policy.

POLICY FOR PRESERVATION OF DOCUMENTS

1. Documents and Records of the Company required to be maintained under the Listing Regulations shall be classified in two categories as below:

- a) Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time; (List of such Documents are given in Annexure A).
- b) Other Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions the subject to the modifications, amendments, addition, deletion or any changes made therein from time to time. (List of such Documents are given in Annexure B)

2. The listing documents and records in physical form shall be in the custody of the Company Secretary.

3. The Company may keep the listing documents and records as specified above in electronic mode.

4. The Registrar and Share Transfer Agent shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained by them and provide an annual undertaking to the Company in this regard.

5. 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, other than disposal of Documents as permitted under this Policy.

6. The preserved Documents must be accessible at all reasonable times. Access shall be controlled by the Authorised Persons, so as to ensure integrity of the Documents and prohibit unauthorized access. Where the Authorised Person tenders his resignation or is transferred from one location of the Company to another or is otherwise no longer employed with the Company, such person shall hand over all the relevant Documents, lock and key, access control or password, or company disc, other storage devices or such other Documents and devices in his possession under the Policy to the new head of such department.

7. The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Act and Regulations.

8. Documents and Records maintained under this policy can't be disposed without the approval of the Board and Authorised Person "if any" for same.

9. Register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction. The entries in the register shall be authenticated by the Authorised Person. The format of the register has to be in accordance with as suitable.

ARCHIVAL POLICY

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 3 years.

Annexure – A

- The memorandum and articles of the company
- Affidavit from the subscribers to the memorandum and from persons named as the first directors
- Register of Members (MGT-1)
- Register of Renewed and Duplicate Share Certificate (SH-2)
- Books and Documents relating to the issue of share certificates, including the blank forms of share certificates
- The Foreign Register of Members
- Register of Charges (CHG-7)
- Minutes Book of General Meeting, Board Meeting and Committee Meeting.
- Register of particulars of loans and guarantee given, securities provided & acquisition of securities made by the Company (MBP-2)
- Register of Investments not held in its own name by the Company (MBP-3)
- Register of Contracts with related party and contracts and Bodies etc. in which Directors are interested.(MBP-4)
- Register of Directors and KMPs
- Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time

Annexure – B

- Instrument Creating a Charge or modification thereon (8 years from the date of satisfaction of charge)
- Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities)(MGT-2)
- Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)
- Foreign register of debenture holders or any other security holders (8 years from the date of Redemption)
- Books of Account together with relevant vouchers (Not less than 8 financial year)
- All notices pertaining to disclosure of interest of directors (MBP-1) for a period of 8 years from the end of the financial year to which it relates)
- All certificates surrendered to a company (3 years from date of surrender)
- The postal ballot and all other papers relating to postal ballot including voting by electronic means, (as long as they remain current or for 8 financial years), whichever is later.
- All books and documents relating to the issue of share certificates, including the blank forms of share certificates not less than 30 years.
- Any other document as may be required to be maintained for eight years in terms of applicable law(s).