

UMIYA TUBES LIMITED
(CIN: L28112GJ2013PLC074916)

Registered Office:
208, 2nd Floor, Suman Tower, Sector No. - 11, Gandhinagar -382011 (Gujarat)
Contact No: 9033090051, 9727715568 E-mail Id: info@umiyatubes.in Website:
www.umiyatubes.in

UMIYA TUBES LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

• **PREFACE**

The Board of Directors (the "Board") of Umiya Tubes Limited has approved and adopted the following Policy ("The Policy") of the Company for preservation 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 the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records in physical or electronic form, which are required to be maintained as per the applicable statutory and regulatory requirements.

I. OBJECTIVE

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in at least two following categories as follows:

- ❖ Documents whose preservation shall be permanent in nature;
- ❖ Documents with preservation period of not less than eight (8) years after completion of the relevant transactions.

Provided further that the Company may keep the documents as specified above in electronic mode.

II. CATEGORISATION

I. Documents for permanent preservation:

- i. Register of members;
- ii. Index of members;
- iii. Register of Charges;
- iv. Register of contracts or arrangements in which directors are interested;
- v. Register of loans, guarantee, security and acquisition made by the company;
- vi. Register of investments not held in its own name by the company;
- vii. Minutes of the General Meetings;
- viii. Minutes of the Board Meetings and Committees of Board;
- ix. Annual Reports of the Company; and
- x. Any other information or document as the Board may determine from time to time.

II. Documents for periodic preservation:

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- i. Register of Deposits for a period of not less than 8 years from the financial year in which the latest entry is made in the register.
- ii. Copies of all annual returns prepared and copies of all certificates and documents required to be annexed thereto 8 yrs from the date of filing.
- iii. Signed Annual Accounts and all relevant vouchers and documents relating thereto 8 years from the date of closure of the financial year.
- iv. Audited / Unaudited financial results and all other relevant documents 8 yrs from the date of closure of the relevant financial year.
- v. Office copies of Notices, scrutinizer's report and related papers shall be preserved as long as they remain current or for 8 financial years.
- vi. Office copies of Notices, agenda, Notes on agenda of Board Meetings and other related papers shall be preserved as long as they remain current or for 8 financial years.
- vii. The attendance register(s) shall be preserved for a period of 8 financial years.
- viii. Legal documents, lease agreements, title deeds etc. 8 yrs from the date of expiry.
- ix. Electronic Mail: E-mail that needs to be saved should be either:
 - a. Printed in hard copy and kept in the appropriate file; or
 - b. Downloaded to a computer file and kept in electronic form or on disc as a separate file.
- x. Other documents, as specified by Board for such period as may be determined by Board from time to time.

Notwithstanding anything contained in this Policy, the Company shall ensure to comply with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

III. Custody of the Documents

Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Persons Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc or other storage devices or such other documents and devices in his possession under the policy. The board may authorize such other person as it may deem fit as the Authorized person.

IV. 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.

Any term herein shall have the same meaning as defined in the Companies Act, 2013 and

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Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any other applicable law or regulation to the extent applicable to the Company.