

LA OPALA RG LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY

1. Purpose and Scope

The purpose of this document is to present a policy for La Opala RG Limited (hereinafter referred to as “the Company”) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and in accordance with the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The policy is intended to define the Company’s preservation of documents responsibilities and to provide guidance to the employees working in the Company in making decisions and undertaking other activities that may have an impact on the operations of the Company.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed off, if no longer needed and how the documents should be accessed and retrieved when they are needed.

As stipulated under Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, this policy has been drafted which was adopted and approved by the Board of Directors of the Company at its meeting held on 14th November 2015. This Policy shall be effective from 1st December 2015.

The Company has classified the preservation of documents, in two categories as follows:

- a. Documents whose preservation shall be permanent in nature;
- b. Documents with preservation period of eight years after completion of the relevant transactions:

Provided that the Company may keep the documents in electronic mode

2. Policy

- A. Documents whose preservation shall be permanent with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently. The following list are indicative not exhaustive.

Sl. No.	Name of Documents	Reference*
1	Minutes of Board Meetings	Rule 25 of the Companies (Management and Administration) Rules, 2014.

2	Minutes of Committee Meetings	Rule 25 of the Companies (Management and Administration) Rules, 2014
3	Minutes of General Meeting	Rule 25 of the Companies (Management and Administration) Rules, 2014
4	Register of Members including an index of the names **	Section 88 & the Companies (Management and Administration) Rules, 2014.
5	Register of Renewed and Duplicate Share Certificates **	Rule 6(3) of the Companies (Share Capital and Debentures) Rules, 2014.
6	Register of charges	Section 85 & the Companies (Registration of Charges) Rules, 2014
7	Register of Loans, guarantee, security and acquisition made by the Company	Section 186(9) & Rule 12(1) of the Companies (Meetings of Board and its Powers) Rules, 2014
8	Register of Investments not held in the own name by the Company	Section 187(3) and rule 14(1) of the Companies (Meetings of Board and its Powers) Rules, 2014.
9	Register of contracts with related party and contracts and Bodies etc. in which directors are interested	Section 189(1) and rule 16(1) of the Companies (Meetings of Board and its Powers) Rules, 2014.

* Section and Rules refer to The Companies Act, 2013.

**These documents shall be kept in the custody of Registrar and Transfer Agent or any other person authorized by the Board for such purpose.

B. Documents whose preservation shall be not less than eight years with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, and Notifications etc. for a period of not less than eight years after completion of the relevant transactions shall be preserved accordingly. The following list are indicative not exhaustive.

Sl. No.	Name of Documents	Reference*
1.	Books of Accounts including vouchers relevant to any entry in such books of account	Sec 128(5)
2.	Attendance Register for meeting of Board and its Committees	
3.	Registers of deposits	Section 73 & the Companies (Acceptance of Deposits) Rules, 2014
4.	The instrument creating a charge or Modification	Section 85 & the Companies (Registration of Charges) Rules, 2014
5.	Reconciliation of Share Capital Audit Report	Reg. 55A SEBI(Depositories and Participants) Regulation, 1996
6.	Compliance Certificate to the exchange about the share related activities maintained by RTA registered with SEBI	Sec 7(3)

7.	Compliance Certificate w.r.t., Transfer or Transmission or transposition within 30 days	Sec 40(10)
8.	Record date for declaring dividend and bonus	Sec 42(2)
9.	Corporate Governance Report	Reg. 27(2)(a)
10.	Disclosures under code of Internal Procedures and Conduct for regulating, Monitoring and Reporting of Trading by Insiders	Sec 10(1)
11.	Disclosures/ Notices by a director of his interest	the Companies (Meetings of Board and its Powers) Rules, 2014.
12.	Office copies of Notices, Scrutinizer's Report related to General Meeting	
13.	Any other documents submitted to stock exchange	Reference*

*Reg. refer to the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 otherwise stated and Section and Rules refer to The Companies Act, 2013.

C. Other Documents

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in Para 1) & 2) above shall be preserved accordingly.

3. 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.

4. Amendment to the policy

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision/amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

The Board of Directors may review this policy on an annual basis.
