

VIPUL LIMITED

Policy for Preservation of Documents

This policy for Preservation of Documents (the "Policy") as framed in accordance with Regulation 9 of the SEBI (Listing Obligations and Disclosures Requirements (Regulations), 2015 & schedules thereto, duly approved by the Board of Directors of the Company in its meeting held on November 14, 2015

PURPOSE

The purpose of this policy is to state the principles that guide the care and preservation of Documents. It concerns all materials in all formats including digital records and surrogates which includes:

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

The Policy also facilitates in effective corporate governance and risk management;

DOCUMENT RETENTION SCHEDULE (for both hard and electronic copies)

- The documents / information available on the website of the Company may be maintained in the Archives Section after five years from the date of their respective disclosures.
- The documents/information which are permissible and/or feasible to be maintained by the Company in electronic forms shall be preserved from being corrupted and also be routinely monitored in order to identify any formats that are at risk of obsolescence.
- The documents/information which are permissible and/or feasible to be maintained by the Company in physical forms shall be preserved from being destroyed by pests and also be routinely monitored in order to keep them safe from being damaged in natural course.

The books and papers of a company which has been amalgamated with, or whose shares have been acquired by, another company under this Chapter shall not be disposed of without the prior permission of the Central Government and before granting such permission, that Government may appoint a person to examine the books and papers or any of them for the purpose of ascertaining whether they contain any evidence of the commission of an offence in connection with the promotion or formation, or the management of the affairs, of the transferor company or its amalgamation or the acquisition of its shares.

- The Minutes Books, register of members/debenture holders along with the index, statutory registers etc., shall be preserved permanently.
- Office copies of Notices, Agenda, Notes on Agenda and other related papers shall be preserved in good order in physical or in electronic form for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board.
- Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto shall be preserved for a period of eight years from the date of filing with the Registrar.
- The foreign register of member, if any, shall be preserved permanently, unless it is discontinued and all the entries are transferred to any other foreign register or to the principal register. Foreign register of debenture holders or any other security holders shall be preserved for a period of eight years from the date of redemption of such debentures or securities.
- The preservation period for other documents/information is as per requirement under various statutes applicable to concerned documents/information, from time to time.

DESTROY POLICY

The documents which are permitted or have become obsolete and which are no more required shall be destroyed permanently after the approval from Managing Director and/or Chief Executive Officer of the Company.

DISCLOSURE OF THE POLICY

This Policy shall be uploaded on the Company's website for public information and a web link for the same shall also be provided in the Annual Report of the Company.

REVIEW OF THE POLICY

The Board will review this Policy and make revisions as may be required from time to time.