

A. K. SPINTEX LIMITED

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Dec 31, 2015

To,
The General Manager
DCS-CRD
Bombay Exchange Ltd.
Rotunda Building
P.J. Tower, Dalal Street, Fort
MUMBAI - 400001

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BSE SCRIP: 539300

Sub: Submission of the policy for Preservation of documents under Regulation 9 of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015

Dear Sir.

In compliance of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 please find enclosed policy for Preservation of documents under Regulation 9 of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015

Kindly note that the above said policy was approved by Board of Directors at their meeting held on 14th Dec, 2015 and a copy of the same is also hosted on company's website.

You are requested to please take on record our above said document for your reference and further needful.

Thanking You

Yours faithfully

For: A.K. SPINTEX LIMITED

Ashish Kumar Bagrecha Company Secretary& Compliance Officer FOT: A.K. SPINTEX LTD.
ASHISH KUMAR BAGRECHA
ASHISH KUMAR BAGRECHA
COMPANY SECRETARY

Policy for Preservation of Documents for "A.K. SPINTEX LINITED"

Unser Regulation 9 of the SEBI (Listing Obligations and Disclosures requirment) Regulations, 2015

1. PREAMBLE:

The Board of directors (Board) of A.K. SPINTEX LIMITED ("The Company" or "AKSL") Has adopted the following policy and procedure with regard to preseveration of documents as defined below. The Board will reviwed and may amend this policy from time to time.

2. PURPOSE:

This policy is framed as per requirment of Regulation 9 of the SEBI (Listing Obligations and Disclosures requirment) Regulations, 2015.

3. INTRODUCATION:

A document preservation policy involves the systematic identification, categorization, maintenance, review, retention, and destruction of documents received or created in the course of business.

The policy contains the guidelines how to identify documents that need to be maintaines, how long cretain documents should be retained, how and when those documents should be disposed of if no longer needed, and how should be accessed or retrieved when they are needs as per the rules made under the law.

4. **DEFINITIONS**:

- I. Act: Means Companies Act, 2013
- II. Board Of Directors: Means Board of Director of A.K. Spintex Limited
- III. The company: Means: "A.K. Spintex Ltd", of "the Company" or "AKSL"
- IV. SS-1: Means Secretrail Standard-1 for the Board Meeings as notified by the ICSI
- V. SS-2: Means Secretrail Standard-2 for the General Meeings as notified by the ICSI
- VI. SEBI (LOADR) Regulation: Means SEBI (Listing Obligations and Disclosures requirments) regulations, 2015
- VII. Compliance Officer: The officer appointed by the Board of Directors of the company for the purpose of these regulations from time to time
- VIII. SEBI: The Security Exchanges Board of India.
- IX. Rules: Rules made under companies Act, 2013
- X. Regulations: Regulations made under the SEBi Act.

5. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

The Board of directors shall decide necssity of preservation of documents permanently from time to time as required under the Act and regulation

Notwithstanding anything contained herein the Act, SS-1 and SS-2 the following documents/records maintained under the Act, Rules and regulations shall be preserved permanently and hosted on the website of the company:-

- a. Financial statements, duly signed annual reports,
- b. Annual Returns filed with the ROC
- c. Minutes of all the general Meetings, Board & Committee Meetings
- d. Disclosure made under the SEBI Insider and Takeover Regulations and the SEBI (LOADR) Regulation, 2015 to the stock exchange from time to time.
- e. Memorandum and Article of Association of the company as may be amended from time to time.
- f. Shareholders and Joint Venture agreement.

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- g. Letter of offer related to public issue, right issue, further issue, buyback offer, etc
- h. Any others, if Board of Directors may think deemed fit.
- i. Agreements with the Share Transfer Agent, Depositories.

6. DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS COMPLETION OF THE RELEVENT TRANSACTION:

- a. Notice of the Board meetings given to the Stock Exchange for considering matters relating to pre-intimations required to be submitted to the Stock Exchanges.
- b. Date for the Book Closures and Record dates for various purposes as may be decided by the company from time to time.
- c. Quarterly and half yearly and annual financial result of the company.
- d. Quarterly Shareholding pattern inculding details for pleadge of shares and any changes therein.
- e. Result of the E-voting, General Meetings, Postal Ballot etc.
- f. List of Unpaid dividend to the shareholders.
- g. Change in the constitution of the Board of Directors, KMP, Compliance officers, Auditors, Secretrail Auditors, Share Transfer Agent.
- h. Any price sensitive information given or provided to the Stock exchange under Regulation 30 of the SEBI (LOADR) Regulations, 2015
- i. Recommendation and payment of divedevd to the shareholders
- j. Details of the complaints received and resolved by the company.
- Corporate Governance Report submitted to the Stock Exchange on quarterly and annual basis
- Copy of the orders issued by the SEBI or Stock Exchanges relating to securities listed with the Stock Exchanges.
- m. Dislosures made under companies act, in form MBP-1
- n. Registers maintaines under the Companies Act.

The above said documents shall be hosted by the company on its website for a period as least 8 years. The Board of directors may decided the preservation period for any particular documents.

7. RESPONSIBILTY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS:

The company secretary and in absence thereof key managerial personnel of the company authoriside by the Board of directors of the company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destory documents pertaining to their area.

8. AUTHORIZATION FOR MONOTORING THE POLICY:

The company secretary or any one key managerial personnel of the company authorisied by the Board of directors of the company shall be responsible for monitoring the polocy. The authorized person shall inform its Board of directors about the monitoring of the policy.

The authorized person take necessary step to discharge his duty.

9. PRESERVATION PRINCIPLES:

It is only through preservation that continued avaliability and access to items in the collections can be maintained. The following principles shall be kept in mind:-

- Where possible, documents are preserved in their original format, respecting the physical intergrity and authenticity of the original documents.
- Active conservation is employed when appropriate to prevent further deterioration or damage to an item, or to enable access to be given.

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- Appropriate conservation measures will take into accounts the needs, value, significance and usage of the item in question.
- Surrogates shall be created where appropriate to protect the original, and to allow wider access to the content, Surrogates shall not replace the original, which will still need preservation.
- All staff are made aware of the paramount importance of preservation, and are trained on safe handling of documents.

10. SECURITY OF DOCUMENTS:

The Board shall ensure that all the documents shall keep in safe place place in the companies premises. The Board may authorized person for the security of documents, who shall be responsible for safe custody of documents.

11. SUPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS:

In case the company is served with any notice for request of documents or any employee becoms aware of a governmental investigation or audit concering of the company or commencement of any litigation against the company, such empolyee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from legal connsel determine orherwise, The Top management in such case shall informe all the employees the need to retain the documents and suspension of disposal of the same.

12. DISPOSAL OF DOCUMENTS:

Disposal of Documents after said period of 8 years (whose preservation shall not be parmanent in nature) shall be done in the preservance of Authorized person in method prescribed by Board of directos. Before disposing a soft copy shall be taken for the record.

13. REVIEW OF THE POLICY:

The board of directors of the company shall review the policy on annual basis. The authorized person shall provide regular assurance to board of directors on the effectiveness of the policy.

Note: The above said policy was approved by the Board of directors at their meeting held on 14th Dec, 2015 and shall become applicale w.e.f. 1st Jan, 2016

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