POLICY ON PRESERVATION OF DOCUMENTS

1. PREAMBLE

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 **("Listing Regulations")**, the Board of Directors (the "**Board**") of Vertex Securities Limited (VSL) has adopted this Policy at its meeting held on November 6th , 2015, for Preservation of Documents, as required under applicable regulations.

This Policy is effective from **December 01, 2015**.

2. DEFINITIONS

a) **"Board of Directors" or "Board"** shall mean the Board of Directors of **Vertex Securities Limited,** as constituted from time to time.

b) **"Company"** shall mean "**Vertex Securities Limited**".

c) **"Documents"** shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

d) **"Listing Regulations"** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

e) **"Preservation"** means to keep in good order and to prevent from being altered, damaged or destroyed.

3. OBJECTIVE

This Policy on Preservation of Documents would ensure safekeeping of the records while at the same time avoiding superfluous inventory of Documents. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

The preservation of documents of the company, as approved by the Board of Directors of the company, shall be classified into two categories as follows:

A. Documents whose preservation shall be permanent in nature:

The documents of a permanent nature (listed in **Annexure - 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

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Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

B. Documents with preservation period of not less than eight (8) years after completion of the relevant transactions:

The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure-2)** shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years

4. MODES OF PRESERVATION

a) The Documents may be preserved in:
- Physical form or
- Electronic Form.

b) The officer of the Company required to preserve the Document shall be Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law.

c) 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.

d) The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

e) The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space. This will be done after obtaining prior approval of the Board.

f) Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

5. DESTRUCTION OF DOCUMENTS

a) Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both Physical and Electronic Documents.

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b) The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents that may be destroyed as normal administrative practice is listed in **Annexure 3.**

c) A 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.

d) The entries in the register shall be authenticated by the Authorised Person.

6. GENERAL

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.

7. AMENDMENT

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.

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Annexure 1

Documents whose preservation shall be permanent in nature

Sl. No	Nature of Document(s)
1.	Registration Certificates
2.	Licenses & Statutory Approvals
3.	The Memorandum and Articles of the Company
4.	Statutory Registers required under applicable laws
5.	Audited Financial Statements
6.	Minutes of General Meeting
7.	Minutes of Board Meeting
8.	Minutes of various Committee Meetings
9.	Annual Returns
10.	Material Agreements/Contracts
11.	Orders issued by Courts/Statutory bodies
12.	Investment Documents/proofs including certificates etc.
13.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

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Annexure 2

Documents with preservation period of not less than eight (8) years after completion of the relevant transactions

S. No	Nature of Document(s)
1.	Quarterly, Half Yearly, Yearly submissions with the Stock Exchanges
2.	Mandatory newspaper publications
3.	General Meetings, Board Meetings and Committee Meetings Documents
4.	Correspondence with Regulatory Authorities – • Registrar of Companies • Securities and Exchange Board of India • Reserve Bank of India • Equity and Commodity Stock Exchanges • NSDL • CDSL • Any other regulatory authority related to the Company
5.	Correspondences with Departments/Shareholders
6.	Electronic/Postal Ballot/Poll Voting Results of Shareholders
7.	Personnel Documents
8.	Rent, Lease and Franchisee Agreements
9.	Insurance Policies/ Claims under various policies
10.	Non-Statutory Registers/Documents
11.	Films, Videos, CDs, DVDs, tapes etc.
12.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

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Annexure 3

The following categories of Documents may be destroyed as normal administrative practice:

- Catalogues;
- Copies of press cuttings, press statements or publicity material;
- Letters of appreciation or sympathy, or anonymous letters;
- Telephone messages;
- Drafts of reports, correspondence, speeches, notes, spread sheets, etc.
- Routine statistical and progress reports compiled and duplicated in other reports.

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