



ARCHIVAL POLICY/POLICY FOR PRESERVATION OF DOCUMENTS

Under Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Approved by
Board of Directors

Dated : 7th February, 2024

BSEL ALGO LIMITED

CIN: L99999MH1995PLC094498

Registered & Corporate Office:

737,7th Flr, The Bombay Oil Seeds & Oil Ex. Premises Co-op Soc. Ltd. Commodity Ex.
Sector-19, PL 2, 3 & 4, Vashi Navi Mumbai, 400705

PRESERVATION OF DOCUMENTS AND ARCHIVAL POLICY



PREAMBLE:

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [‘Listing Regulations’] mandates that every listed entity shall have a policy for preservation of documents/records maintained by the Company either in Physical Mode or Electronic Mode, classifying them into the following categories: -

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

OBJECTIVE:

This Policy is formulated to preserve statutory records and documents as mentioned in various provisions of the Companies Act, 2013, SEBI (Prohibition of Insider Trading) Regulations, SEBI (Substantial Acquisition of Shares and Takeover) Regulations, Listing Regulations and such other acts, rules and regulations as amended from time to time, applicable to the Company.

GUIDELINES FOR PRESERVATION OF DOCUMENTS/RECORDS:

The Company has classified managing, storing and preservation of documents in the following manner:

- a) Documents (along with modifications, amendments, additions, deletions, if any) of a permanent nature provided in **Annexure A** shall be maintained and preserved permanently by the Company.
- b) Documents (along with modifications, amendments, additions, deletions, if any) with preservation period of not less than eight years after completion of the relevant transactions as provided in **Annexure B**.
Provided further that the Company may keep the documents as specified above in electronic mode.

DOCUMENTS STORAGE:

Preservation of documents should ensure that there is no tampering, alteration, theft or malicious damage or anything which poses a threat to the content, authenticity, utility or accessibility of the same.

Integrity of records for permanent preservation should be maintained and monitored via pest management programme and other environmental monitoring systems and they should be accessible at all reasonable times.

Access shall be controlled by an authorised person from each division, so as to prevent unauthorized access. Physical documents may be converted into electronic form, whenever necessary, to ensure ease in maintenance of records and efficient utilization of space.



DESTRUCTION OF DOCUMENTS:

After expiry of the statutory retention period, the preserved documents may be destroyed in such mode under instructions of the Department Head concerned. This applies to documents preserved in physical and electronic mode. The Company shall maintain a Register wherein brief particulars of the documents destroyed shall be entered and all entries made therein shall be authenticated by the Department Head concerned.

AUTHENTICITY:

Where documents are being maintained both in physical and electronic form, the authenticity with reference to the physical form should be considered for every purpose.

POLICY REVIEW:

This Policy shall be reviewed periodically so that the same remains compliant with applicable legal requirements.

AMENDMENTS:

The Board shall have the powers to amend or modify this Policy in whole or in part, at any time, without assigning any reason whatsoever, subject, however, to the condition that such alterations will be in consonance with the provisions of the applicable law.

DISCLOSURE:

The Company shall upload this Policy and amendments, if any, on its website.

ANNEXURE A

I. Documents required to be preserved permanently: -

- a) Memorandum and Articles of Association of the Company.
- b) Register of Members and Index of members.
- c) Register of Foreign Members.
- d) Register of renewed/duplicate Share Certificates, Forms and related documents.
- e) Minutes of the Board and its Committees, General Meetings including Postal Ballot minutes.
- f) Registers viz. Loans/Investments/Guarantees/Security, Contracts in which Directors are interested and Charges.

ANNEXURE B

II. Documents required to be preserved up to 8 years: -

- a) Annual Returns.
- b) Notices/Agendas of the Board and its Committees.
- c) Attendance Registers of the Board and its Committees.
- d) Notices pertaining to disclosure of interest of directors.
- e) Register of Directors and Key Managerial Personnel and their shareholdings.
- f) Books of Accounts.
- g) Disclosures under SEBI (Depositories and Participants) Regulations, 1996.
- h) Disclosures under SEBI (Prohibition of Insider Trading) Regulations, 2015.
- i) Disclosures under SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011.
- j) Disclosures under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- k) Documents which shall not be disposed of without the prior permission of the Court/Government.