

BONLON INDUSTRIES LIMITED

POLICY ON MAINTENANCE AND PRESERVATION OF DOCUMENTS

1. PREFACE

The Board of Directors (the “Board”) of Bonlon Industries Limited (the “Company”) has adopted the following policy with regard to preservation of Documents. This Policy has been formulated in accordance with regulation 9 of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, This Policy shall be known as “Policy for Maintenance and Preservation of Documents”.

2. PURPOSE OF THE POLICY

The purpose of this policy is to specify the type of Document(s) and time period for preservation thereof based on the classification mentioned under Regulation 9 of Listing Regulation, 2015.

3. TYPE OF DOCUMENT AND TIME PERIOD FOR PRESERVATION

The Company shall maintain and preserve documents as specified hereunder:

Category (A): The documents of permanent Nature (**Listed in Annexure-1**) shall be maintained and preserved permanently by the Company subject to the modification, amendments, addition, deletion, or any changes made therein from time to time.

Provided that all such modification, amendments, addition, deletion in the documents shall also be preserved permanently by the Company.

Category (B): The documents of the Company shall be maintained and preserved for specified time period after completion of relevant transactions (**Listed in Annexure-2**) shall be preserved by the Company for the term not less than eight years after completion of relevant transactions subject to the modification, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modification, amendments, addition, deletion in the documents shall also be preserved for a term not less than eight years.

For the purpose of this policy, document may include the following:

- i. ‘books and papers’ as defined in clause 12 of section 2 of the Companies Act, 2013
- ii. ‘books of Accounts’ as defined in clause 13 of section 2 of the Companies Act, 2013
- ii. ‘documents’ as defined in clause 36 of section 2 of the Companies Act, 2013

iv. 'registers' as defined in clause 74 of section 2 of the Companies Act, 2013

Further, the Company may deeming fit and possible from time to time maintain above mentioned documents in electronic form to the extent possible.

4. ROLES & RESPONSIBILITY

The respective Departmental heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy and to report thereon periodically to the Audit Committee. The Audit Committee of the Company shall periodically review report(s) from head of departments and decide the strategy for preservation of documents.

5. AMENDMENT

Any change in the policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and/ or amend any part of this policy or entire policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

6. COMMUNICATION

Copy of this policy dully approved shall be place before the Board and circulated among all the Directors of the Company for their necessary action. Human Resource and Administration Department are required to notify & communicate the existence and contents of this policy to the employees of the Company. The new employees shall also be informed by about the policy by the Human Resource and Administration Department. The policy amended from time to time shall be made available on the website of the Company wiz: bonlonindustries.com

Annexure-1**Documents whose preservation shall be permanent in nature:**

S.No.	Nature of Document(s)
01	All documents and Information originally filled with the ROC for Incorporation of the Company
02	Memorandum and Articles of Association as originally filed and updated from time to time
03	Register of Members
04	Index of Members
05	Minutes of General Meeting
06	Minutes of Board Meeting
07	Minutes of Various Committee Meetings
08	Any other document as may be required to maintain in terms of applicable Law(s), maintained and preserved form time to time

Annexure 2:**Documents with preservation period of not less than eight years after completion of the relevant transactions:**

S.No.	Nature of Document(s)
01	Books of Accounts
02	Annual Return(s)
03	Statutory Registers
04	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.