

**VIPPY SPINPRO LTD.**  
**POLICY FOR PRESERVATION OF DOCUMENTS**

**1.PREFACE**

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

**3.TYPE OF DOCUMENTS 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 modifications, amendments, addition, deletion or any changes made therein from time to time.

**Category (B):** The documents of the company to be maintained and preserved for 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 year after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

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

**4.PLACE OF PRESERVATION / MAINTENANCE**

The Records shall be preserved / maintained at the Corporate Office of the Company unless any other law requires it to be maintained at the Registered Office or any other place, in which case the same shall be kept at such place.

**5.ROLES & RESPONSIBILITIES**

The respective Departmental Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy.

**6.ROLE OF REGISTRAR AND TRANSFER AGENT**

The Registrar and Transfer Agent of the Company shall ensure that the correct procedures are followed for maintenance of the Records required to be maintained with them.

**7. 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 the 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.

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

S.No	Nature of Document(s)
1	All documents and Information originally filed with ROC for Incorporation of Company
2	Memorandum of Association and Articles of Association as amended from time to time
3	Register of Members including Index
4	Register of Charges
5	Register of Directors and Key Managerial Personnel and their Shareholding
6	Register of Loan, Guarantee, Security and acquisition made by the Company
7	Register of investment made by company not held in its own name
8	Register of Contract or Agreements in which Directors are concerned or interested.
9	Register of renewed and duplicate Share Certificate
10	Minutes of General Meeting
11	Minutes of Board Meeting
12	Minutes of various Committee Meetings
13	All books and documents relating to the issue of share certificates including blank form of share certificates.( not less than 30 Years and in case of disputed case, shall be preserved permanently)
14	Any other document/registers as may be required to maintain in terms of applicable law(s), maintained and preserved from 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)
1	Books of Accounts
2	Annual Return(s)
3	Register of Debenture holders including Index
4	Notice of interest by Directors
5	Register of Deposits
6	Instrument creating the Charge or Modification
7	Attendance registers of Board & Committee Meetings
8	Any other document/Registers as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.