



**Asian Energy Services Limited**

*(formerly Asian Oilfield Services Limited)*

**Policy on preservation of documents**

## 1. Introduction

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Regulations"] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

## 2. Objective

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

The major objectives of the policy are:

- 2.1 Identification of statutory registers and other records of the Company which are required to be preserved.
- 2.2 Identification and categorisation of the statutory registers and other records to be maintained either for eight years or permanently.
- 2.3 Decide whether the statutory records and documents are to be preserved in physical form or in electronic form.
- 2.4 After completion of 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per the guidelines of the Policy or as decided by the Board of Directors at that time.
- 2.5 Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

## 3. Scope

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

## 4. Definitions and Abbreviations

- 4.1 "**Act**" means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;
- 4.2 "**Board of Director**" or "**Board**", means the collective body of the Directors of the Company.
- 4.3 "**Companies Act**" means The Companies Act, 2013.
- 4.4 "**Company**", "**This Company**", "**The Company**", "**Company**" wherever occur in the policy shall mean "Asian Energy Services Limited".
- 4.5 "**Current**" means running matter or whatever is at present in course of passage.

- 4.6 **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- 4.7 **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- 4.8 **“Policy”** or **“This Policy”** means, “Policy on Preservation of Documents”.
- 4.9 **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
- 4.10 **“Register”** means a register maintained under the Companies Act, 2013 or the SEBI Act.
- 4.11 **“Regulations”** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

## **5. Responsibilities**

The Board of Directors shall be responsible for framing and implementation of this policy.

The Compliance Officer/ Company Secretary/ Authorised Person shall be responsible for compliance with the policy.

## **6. Classification of documents to be preserved / retained**

Based on the recommendation of the management of the Company, the Board of Directors has classified the following documents to be retained and preserved:

- a. Documents that need to be preserved / retained permanently – Annexure 1
- b. Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR – Annexure 2
- c. Documents which may be retained for at least 1 year beyond the period of relevance – Annexure 3
- d. Retention and preservation of the Residual Documents, which are not included in the above Annexures shall be maintained as per the provisions of the Companies Act, 2013 and/or other laws applicable to the Company and/or as per the customary practice of a particular department.

## **7. Modes of Preservation**

7.1 The Documents may be preserved in

7.1.1 Physical form; or

7.1.2 Electronic Form.

The official of the Company who is required to preserve the document shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

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.

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

## **7.2 Destruction of documents**

After the expiry of the preservation period specified in the annexed Documents Preservation Schedule, such documents which are no longer required may be destroyed by the concerned department after obtaining prior approval/instruction of Head of Department/Whole Time Director / CFO of the Company. The records of the documents destroyed shall be maintained by the concerned department and shall be produced whenever required by the concerned authority/auditors. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

Where the Company has been served with any Notice requisitioning documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed off finally.

## **8. Policy review and amendment**

This Policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s)/amendment(s) to Regulations. The Company Secretary will keep the Policy updated as per applicable statutory guidelines.

## **9. Reference document (s)**

SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015

## **10. Associated Document (s)**

None

## **11. Annexures**

11.1 Annexure A – Documents Preservation Schedule

11.2 Annexure B - Register for Disposal of Records

===== End of Document =====

#### **Annexure 1**

1. Government approval letters, Certificates, Licenses & Statutory Approvals, Orders issued by Courts / Statutory bodies and any other Statutory and Legal Documents/Agreements.
2. Minutes of proceedings of general meeting and resolutions passed by postal ballot, meeting of Board of Directors, Creditors, committees of the Board and resolutions passed by Circulation.
3. Register of Members along with the index and other Statutory Registers
4. Memorandum and Article of Association.
5. Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

#### **Annexure 2**

1. Disclosure from Directors (Form MBP 1 and DIR 8)
2. Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto
3. Attendance registers of Board & Committee Meetings
4. Office copies of Board Meeting Notices, Agenda, Notes on Agenda and other related papers of the Company
5. Office copies of general meeting Notices, scrutinizers report and other related papers of the company Any other register /documents required by any law, for the time being in force
6. Books of Accounts.
7. Returns, disclosures, filings, etc. with regulatory authorities under various enactments – e.g. periodical reports / returns to SEBI, Stock Exchange, authorities under the laws relating to income- tax, excise and customs, service tax, value added tax, sales tax, etc.

#### **Annexure 3**

1. Confidentiality and Non-disclosure agreements
2. Records pertaining to employees
3. Documents relating to litigation or arbitration
4. Commercial contracts, etc.