

**VENTURA GUARANTY LIMITED
POLICY FOR PRESERVATION OF DOCUMENTS**

VENTURA GUARANTY LIMITED

**POLICY ON PRESERVATION OF DOCUMENTS AS PER SEBI (LISTING
OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS,
2015**

(Adopted by the Boards of Directors on 9th February, 2016)

VENTURA GUARANTY LIMITED

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I. INTRODUCTION

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'Listing Regulations') and Companies Act, 2013. This policy has adopted by "Board of Directors" of "Ventura Guaranty Limited".

The Preservation of Documents (the "Policy") maintained by the Company either in Physical mode or Electronic mode. Archival Policy as referred to in Regulation 30 (8) of the Listing Regulations forms part of this Policy. This policy is intended to ensure compliance particularly with the Listing Regulations and the applicable provisions of Companies Act, 2013.

II. PURPOSE OF POLICY

The purpose of this policy is to have a binding framework for Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows:

- a) Documents whose preservation shall be permanent in nature;
- b) Documents with preservation period not less than eight (8) years after completion of the relevant transactions.

Provided further that the Company may keep the documents as specified in clauses (a) and (b) in electronic mode.

Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents are required to be preserved permanently or up to a certain prescribed time.

Accordingly this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

III. DEFINITIONS

1. "Act" means the Companies Act, 2013 and rules made thereunder, as amended from time to time.

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2. "Board of Directors" or "Board" shall mean the Board of Director of Ventura Guaranty Limited, as constituted from time to time.
3. "Company" means Ventura Guaranty Limited.
4. "Documents" means all papers, records, orders, declarations, files, books, forms and registers, etc., and the like as required to be maintained under any law or regulation for the time being in force.
5. "Electronic Form" with reference to information means any information generated, sent, received or stored in media, magnetic, optional, computer memory, micro film, computer generated micro fiche or similar devices.
6. "Listing Regulations" shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amended thereto.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.

IV. SCOPE

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

V. RESPONSIBILITY

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective department.

VI. PROVISIONS WITH REGARD TO PRESERVATION AND RETENTION OF DOCUMENTS

The Company from time to time establishes retention or destruction of policies or documents or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property and rights. While minimum retention periods are suggested, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

- A. The documents of a permanent nature (listed in Annexure-1) shall be maintained and preserved permanently by the Company subject to the modifications,

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amendments, additions, deletions or any changes made therein from time to time.

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

- B. The document 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 modification, 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 term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

VII. Archival of Documents mentioned in Clause (A) & (B) of Clause VI.

Documents mentioned in sub clause (A) & (B) of Clause VI above shall be maintained/preserved in the same manner for Archival of Documents.

VIII. MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form.

IX. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

X. COMMUNICATION OF THE POLICY

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the intranet and the website of the Company.

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XI. AMENDMENT

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

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Annexure-1

Documents whose preservation shall be permanent in nature

Sr No.	Nature of Document(s)
1.	Certificate of Incorporation
2.	Licenses & Statutory Approvals
3.	Statutory Registers required under applicable laws
4.	Audited financial statements
5.	Minutes of General Meetings
6.	Minutes of Board Meetings
7.	Minutes of various Committee Meetings
8.	Material Agreements/Contracts
9.	Orders issued by Courts/Statutory bodies
10.	Investment Documents/proofs including certificates etc.
11.	Any other document as may 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 years after completion of the relevant transactions

Sr No.	Nature of Document(s)
1.	Books of Accounts
2.	Annual Return
3.	Personnel Documents
4.	Insurance Policies/ Claims under various policies
5.	Correspondence with Departments/ shareholders
6.	Non-Statutory Registers/ Documents
7.	Films, Videos, CDs, DVDs, tapes etc.
8.	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.
