

**POLICY ON PRESERVATION OF DOCUMENTS
AND
ARCHIVAL OF DOCUMENTS ON THE WEBSITE OF THE COMPANY**

1. Purpose and Scope:

The purpose of this documents is to present a high level policy statement for Alora Trading Company Limited (**ATCL**) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and with the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**LODR**").

The policy is intended to define ATCL's preservation of documents responsibilities and to provide guidance to the executives and staff working in ATCL in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frame the guidelines for fundamental accountability of ATCL to retain and preserve its documents as the basis for communication with a range of external stakeholders.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the ordinary course of business. The policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

This policy has been adopted and approved by the Board of Directors at its meeting held on 25th January, 2016.

2. Statutory Mandate:

The policy on preservation of documents and archival is mandated by the provisions of Regulation 9 of Chapter III of LODR, 2015. Under this regulation, the Company has a strategic objective of ensuring that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources.

3. Classification of Documents to be preserved / retained:

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

Sr. No.	Particulars	Document type
1	Documents that need to be preserved / retained permanently	Doc 1
2	Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR	Doc 2
3	Documents to be preserved electronically and archived when necessary	Doc 3
4	Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case	Doc 4
5	Documents like budget papers etc., which may be retained for less than 8 years	Doc 5
6	Documents like budget papers etc., which may be retained for less than 8 years	Doc 6

4. Principle of Responsibility of Employees for Preservation of Documents:

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company's employees would immensely help company's litigation preparedness tool helping the Company's and Outside legal counsel to track down documents to handle the legal cases.

5. Periodical Review of the Policy by Top Management:

The Policy should be flexible and easy to understand and comply with by all employees. The policy should be reviewed periodically by the Top Management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered.

The Top management may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time.

6. Administration:

The Record Retention Schedule approved by the Board of Directors for initial maintenance, retention and disposal schedule for physical records is as given in the annexure.

7. Suspension of Record Disposal in the event of Litigation or Claims:

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. The Top Management in such case shall inform all the employee by mail to retain the documents and suspension of disposal of the same.

APPENDIX

TYPE OF RECORDS

Sr. No.	Particulars
1	Accounting and Finance records including Annual Financial statements
2	Insurance Records
3	Tax records
4	Contracts entered into by or on behalf of the Company
5	Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from any statutory authorities.
6	Legal Files and Records
7	Property Records
8	Payroll Records
9	Pension related Records
10	Personnel and HR Records
11	Programs & Service Records
12	Corporate Social Responsibility Records
13	Electronic Documents including email retention and back up
14	Miscellaneous Records