

KRATOS ENERGY AND INFRASTRUCTURE LIMITED

CIN No.: L40102MH1979PLC021614

Registered Office: 317, Maker Chamber V, 221,
Nariman Point, Mumbai-400 021

Tel No.: 022-22823852/53

Email: dvfl@rediffmail.com

POLICY FOR PRESERVATION OF DOCUMENTS

Under Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015

1. PREAMBLE:

A policy on preservation of documents would ensure safe keeping of the records and safeguard the documents from getting destructed. The Board of Directors (the “Board”) of Kratos Energy & Infrastructure Limited (the “Company”) has approved the following policy (“the Policy”) for preservation of Documents/Records maintained by the Company either in Physical mode or Electronic mode (“Documents”). The Board will review and may amend this policy from time to time.

2. PURPOSE:

The policy is formulated in accordance with the regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

3. INTRODUCTION:

SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 have been notified by Securities & Exchange Board of India on September 02, 2015, which shall replace the existing Listing Agreement entered by the Company with the Stock Exchanges.

The purpose of this policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This policy is also for the purpose of aiding employees of the company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

4. ADMINISTRATION

Attached as **Annexure A** is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode. The Compliance Officer of the Company, (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

5. PROCEDURE FOR DISPOSAL OF DOCUMENTS

The Documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure A** may be destroyed. The Administrator may direct Employees in charge from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under **Annexure A**. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the Documents in the format prescribed at **Annexure B**.

6. SUSPENSION OF DOCUMENTS DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS:

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, than the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

7. ARCHIVAL POLICY:

The Company will maintain all the information or any event in the website live for a period of minimum five years Thereafter the information would be archived under the heading “Past Events/Information” and would be retained in the website such as may be decided by the Compliance Officer or the Chairman.

8. 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 A- DOCUMENTS PRESERVATION SCHEDULE

Sr. No.	RECORD TYPE	PRESERVATION PERIOD
Documents to be retained permanently		
1	Certificate of incorporation	Permanent
2	Certificate for commencement of business	Permanent
3	Memorandum and Articles of Association	Permanent
4	License and Permissions.	Permanent
5	Statutory Forms except for routine compliance.	Permanent
6	Scrutinizers Report.	Permanent
7	Register of Members.	Permanent
8	Index of Members.	Permanent
9.	Common Seal.	Permanent
10.	Minutes Book of Board, General Meetings and Committee Meetings.	Permanent
11.	Statutory Registers.	Permanent
12.	Such other records as may be required under any law from time to time	Permanent

Documents to be retained for a minimum period of 8 years

1.	Annual Returns.	8 years from the filing with the Ministry of Corporate Affairs
2.	Board Agenda and Supporting Documents.	8 years
3.	Attendance Register.	8 years
4.	Office Copies of Notice of General Meetings and related papers.	8 years
5.	Office Copies of Notice of Board Meeting/ Committee Meeting, Agenda, Notes on Agenda and other related papers.	8 years
6.	Personnel Documents	8 years
7.	Correspondences made with any statutory authority	8 years
8.	Instrument creating a charge or modification	8 years from date of satisfaction of charge
9.	Such other records as may be required under any law from time to time	8 or less than 8 years as required

Annexure B

Sr. No.	Description of the Documents destroyed	Date and mode of destruction with the initials of secretary or other authorised person