

PRESERVATION OF DOCUMENTS
&
ARCHIVAL POLICY

HB PORTFOLIO LIMITED

PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY

1) PREAMBLE

The Securities and Exchange Board of India (SEBI) on 2nd September, 2015 issued the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as the "Listing Regulations") effective from 01st December, 2015 with the aim to consolidate and streamline the provisions of existing listing agreements thereby ensuring better enforceability and bringing the basic framework governing the regime of Listed Entities in line with the Companies Act, 2013 and at the same time compiling all the mandates of varied SEBI Regulations / Circulars governing Equity as well as Debt segments of capital market.

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), the 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 of not less than eight years after completion of the relevant transactions:

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

In terms of Regulation 30(8) of the Listing Regulations, the listed entity shall disclose on its website all such events or information which has been disclosed to the Stock Exchange(s) under this regulation, and such disclosures shall be hosted on the website of the listed entity for a minimum period of five years and thereafter as per the archival policy of the listed entity, as disclosed on its website. Accordingly, the Company is required to formulate an Archival Policy for all disclosures of events/information to the Stock Exchanges in terms of the Company's Policy for Disclosure of Materiality of event.

The Board of Directors (the "Board") of HB Portfolio Limited (the "Company" or "HBPL") in their meeting held on 10th February, 2016 has adopted the following Policy for Preservation of documents and Archival as per the requirement of Listing Regulations.

2) DEFINITIONS

- A. **"Board of Directors" or "Board"** shall mean the Board of Directors of HB Portfolio Limited, as constituted from time to time.
- B. **"Company"** shall mean **"HB Portfolio Limited"**.
- C. **"Documents"** shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.
- D. **"Listing Regulations"** shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations").

3. OBJECTIVE

This Policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- A. The documents of a permanent nature listed in **Annexure - I** shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.
- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions listed in **Annexure - II** shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, 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 permanently / for a term not less than eight years.

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

Provided further that documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

5. 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.

6. COMMUNICATION AND DISSEMINATION OF THE POLICY

For all new Employees, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be posted on the web-site of the Company, www.hbportfolio.com

7. GENERAL

Notwithstanding anything contained in this Policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

8. ARCHIVAL POLICY

All disclosures made under Regulation 30 of the SEBI Listing Regulations by the Company to the Stock Exchanges, where shares of the Company are listed, shall be kept on the website of the Company for a period of five (5) years and thereafter in the archives of the Company for a period of three (3) years.

9. AMENDMENT TO THE POLICY

The Board of Directors shall alter, amend or modify this Policy from time to time in line with the requirement of the SEBI Guidelines, applicable law, rules, regulations etc. which may be amended and applicable from time to time.

10. DISCLOSURE OF THE POLICY

This Policy shall be disclosed on the Company's website, www.hbportfolio.com

Annexure - I

Documents whose preservation shall be permanent in nature:

Sr. No.	Nature of Document(s)
01	Registration Certificates
02	Licenses & Statutory Approvals
03	Statutory Registers required under applicable laws
04	Audited financial statements
05	Minutes of General Meeting
06	Minutes of Board Meeting
07	Minutes of various Committee Meetings
08	Agreements/Contracts
09	Orders issued by Courts/Statutory bodies
10	Investment Documents/proofs including certificates etc.
11	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Annexure - II

Documents with preservation period of not less than eight years after completion of the relevant transactions

Sr. No.	Nature of Document(s)
01	Books of Accounts
02	Annual Return(s)
03	Personnel Documents
04	Insurance Policies/Claims under various policies
05	Correspondences with Departments/Shareholders
06	Non-Statutory Registers/Documents
07	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.