

MKVENTURES CAPITAL LIMITED

(Formerly known as “IKAB SECURITIES AND INVESTMENT LIMITED”)

ARCHIVES MANAGEMENT POLICY ON PRESERVATION OF DOCUMENTS

POLICY VERSION CONTROL:

VERSION NO.	APPROVED BY BOARD ON	REMARKS
1.0	08.08.2022	Policy adopted in supersession of previously adopted policy.
2.0	12.11.2022	Substitution of “Ikab Securities And Investment Limited” with the new name “MKVentures Capital Limited” from the Policy document.
3.0	30.05.2023	Policy adopted in supersession of previously adopted policy.

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(In terms of Regulations 9 and 30 of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015)

INTRODUCTION

MKVentures Capital Limited (the “Company”) is guided by various legal, regulatory and statutory requirements as applicable from time to time, with regard to record keeping, record retention and destruction of obsolete records. The records are to be maintained based on the type and kind of records in a manner so as to comply with all applicable Acts, Rules, Regulations and Guidelines, and the retention periods indicated therein.

Further, Regulation 9 the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “Regulations”) has mandated all the listed Companies to frame a Policy for Preservation of Documents as approved by the Board of Directors.

In view of the above, the Company has framed this Policy for Preservation of Documents (the “Policy”).

SCOPE

This Policy provides a framework for ensuring that official records and documents, both physical and electronic, including emails, are adequately maintained and protected. The Policy also deals with the retrieval process and disposal/destruction of obsolete records.

This Policy covers records retained at the Company’s own location and/or at the locations of the Registrars and Share Transfer Agents appointed by the Company.

KEY FEATURES

All records, whether held in the physical form or in the electronic media, will be kept in good condition, stored safely and in an orderly manner to facilitate ease of retrieval.

Managing physical records involves identification, labelling, filing, storing, archiving and disposal. Managing electronic or digital records involves storing, safeguarding, providing back up and ensuring alternate locations for easy retrieval.

As required by the Regulations, this document outlines the policy in respect of the maintenance of records, specifically in relation to record retention and location. Some of the key features of the Policy are Record maintenance, Record keeping, Record retention, Record media and Record location.

ADMINISTRATORS

The Administrators of this Policy shall be the Managing Director and the Company Secretary. Their responsibilities are supervision of the preservation of documents as per the Schedule herein mentioned below. The Administrators may modify and review the Document Preservation Schedule to comply with the law and organizational policies.

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PHYSICAL RECORDS

- a) Each of the Departments is responsible for keeping track of the location and contents of all physical records for which they are responsible. The respective Departments will ensure that physical records are kept in good condition, stored safely in an orderly manner and correctly labelled to facilitate ease of retrieval. They will also ensure the confidentiality of the records and ensure that no unauthorized person gets access to the records.
- b) Records and Registers relating to Members, shares and other securities of the Company, including the Members’ Register, shall be maintained by the Company’s Registrars and Share Transfer Agents appointed by the Company. The Company may also engage third-party custodians to retain any of the documents subject to this Policy, provided that the Department responsible for such records will exercise supervision over such third-party custodian and will continue to have overall responsibility for the records maintained with the third-party custodian.

ELECTRONIC DOCUMENTS

- a) Each of the Departments is responsible for keeping track of all electronic records for which they are responsible. The respective Departments will ensure that electronic records are stored safely on computers and password protected for confidentiality and backed up on servers or external hard drives or in any other appropriate manner for easy retrieval. They will also ensure the confidentiality of the records and ensure that no unauthorized person gets access to the records.
- b) The IT Department shall be responsible for formulating processes for proper maintenance of electronic records, password policy for maintaining their confidentiality, processes for proper back-up of the records and will also ensure remote location back-up servers.

AMENDMENT TO THE POLICY

In case of any modification / amendment / re-enactment of any existing acts, rules, regulations, guidelines, etc. or an enactment of any new act, rules, regulations, guidelines, etc., which are inconsistent with this Policy, then such modified / amended / re-enacted provision or new provisions shall prevail over the Policy.

The Chairman and Managing Director is authorized to amend this Policy to be consistent with the prevailing provisions of Acts, rules, guidelines, regulations and in accordance with administrative/ business requirements of the Company. Any clarification needed on the Policy may be referred to Company Secretary Department.

DISCLOSURE ON WEBSITE

The Policy shall come into effect immediately. A copy of the Policy, including amendments thereto shall be hosted on the website of the Company

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DOCUMENTS

“Documents” refers to all corporate records, which include papers, files, registers, writings, memos, manuscripts, communications, agreements, sale deed, conveyance licenses, opinions, press releases, circulars, judgments, orders, approvals, registration certificates, building plans, etc. generated or received or maintained by the Company in the course of its business either in physical form or in electronic form produced by a computer or by any other device but not limited to emails and attachments, scanned papers, word documents, presentations, spreadsheets, databases, pictures, graphics required to be maintained and preserved by the Company in physical or electronic form in terms of securities laws, as defined under Regulation 2(1)(zf) of the Listing Regulations and other applicable laws & statutes.

CLASSIFICATION OF DOCUMENTS

The documents or registers that need to be preserved are classified into the following categories:

1. Documents to preserve permanently (Category –I)
2. Documents to preserve for 8 years (Category – II)
3. Documents to preserve for a period of less than 8 years (Category – III)

RESPONSIBILITY

All employees of the Company are equally responsible to for taking appropriate action and judgement in preserving the documents under the policy.

This Policy is approved by the Board of Directors with the authority to the Managing Director to make necessary amendments, if any, as per the requirement of the applicable statute or as per the changing requirement of the business operations. However, any major amendment with respect to the reduction of the preservation period would require specific approval of the Board.

(Category-I)

DOCUMENTS TO BE PRESERVED PERMANENTLY

Sr. No.	Section/Rules	Description of documents	Time upto which documents to be
1	Section 186(9) & rule 12(1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Registers of loans, guarantee, security and acquisition made by the Company	Permanently
2	Section 187(3) and rule 14(1) of the Companies (Meetings of Board and its Powers) Rules, 2014.	Register of investments not held in its own name by the Company	Permanently
3	Section 189 (1) and rule 16 (1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of contracts with related party and contracts and Bodies, etc. in which directors are interested	Permanently

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4	Section 85 & the Companies (Registration of Charges) Rules, 2014	Register of Charges	Permanently
5	Section 88 & the Companies (Management and	Register of Members, including an index of the names	Permanently
6	Section 88 & the Companies (Management and	Foreign register of members	Permanently
7	Rule 25 of the Companies (Management and Administration) Rules,	Minutes of General Meetings	Permanently
8	Rule 25 of the Companies (Management and Administration) Rules,	Minutes of the Board and Committee Meetings	Permanently
9	Rule 18 of the Companies (Share Capital and Debentures) Rules, 2014	Debenture trust deed	Permanently
10	Rule 6 (3) of the Companies (Share Capital and	Register of Renewed and Duplicate Share Certificates	Permanently
11	Rule 7 of the Companies (Share Capital and Debentures) Rules,2014	All books and documents relating to the issue of share certificates, including the blank forms of share certificates	not less than thirty years and in case of disputed cases shall be preserved permanently.
12		Minutes of Provident, Superannuation and Gratuity Fund Trusts	Permanently
13		Claim Files (Including correspondence, medical records, injury documentation, etc)	Permanently
14		Releases and Settlements	Permanently
15		Annual Information Returns – State and Central	Permanently
16		Licences and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanently
17		Court Orders	Permanently
18		Correspondence, Property Deeds, Assessments, Licenses, Rights of	Permanently
19		Original Purchase / Sale Deeds	Permanently
20		Records on CSR Projects(including the amount budgeted, spent and balance, if any) projects undertaken and	Permanently
21		Annual Reports	Permanently

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Category-II:

DOCUMENTS TO BE PRESERVED FOR A PERIOD OF 8 YEARS or above

Sr. No.	Section/Rules	Description of documents	Time upto which documents to be preserved
22	Section 88 & the Companies (Management and Administration) Rules, 2014	Annual return and copies of all certificates and documents required to be annexed	Preserved for a period of eight years from the date of filing the Registrar
23	Section 88 & the Companies (Management and Administration) Rules, 2014	Foreign register of debenture-holder	Preserved for a period of eight years from the date redemption of such debentures
24	Section 88 & the Companies (Management and Administration) Rules, 2014	Register of debenture-holders including an index of the names	Preserved for a period of eight years from the date redemption of debentures or securities, as
25	Section 73 & the Companies (Acceptance of Deposits) Rules, 2014	Registers of deposits	For a period of not less than eight years from the financial year in which the latest entry is made in the register
26	The Companies (Meetings of Board and its Powers) Rules, 2014.	Disclosures/ Notices by a director of his interest	For a period of eight years from the end of the financial year to which it relates
27	128(5)	Books of Accounts including vouchers relevant to any entry in such books of	8 financial years preceding current financial year
28		Group Insurance Plans &	For a period of eight years
29		Accounts payable & receivable ledgers and	For a period of eight years
30		Bank Statement and Cancelled	For a period of eight years
31		Employee Expense Reports	For a period of eight years
32		Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supporting documents)	For a period of eight years
33		Employee Records	15 years from the year of resignation/retirement

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(Category-III)

DOCUMENTS TO BE PRESERVED FOR A PERIOD OF LESS THAN 8 YEARS

Sr. No.	Section/Rules	Description of documents	Time upto which documents to be preserved
34	Rule 7(3) of the Companies (Share Capital and Debentures) Rules, 2014	All certificates surrendered to a company shall immediately be defaced by stamping or printing the word “cancelled” in bold letters	May be destroyed after the expiry of three years from the date on which they are surrendered,
35		ROC Filings and Stock Exchange filings in physical and Electronic form	5 years from the date of filing
36		Annual plans & budgets	3 years after the budget year is closed
37		Legal Memoranda and Opinions	3 years after the closure of the matter
38		Original Lease Agreements	3 years after the expiration of the lease
39		Litigation files	1 year after the expiration of the disposal of the case

ARCHIVAL POLICY

The disclosures as made by the Company and uploaded on its Website shall be retained in the Webpage for a period of 5 years, and thereafter the same may be archived and kept for a period for a period of 1 year thereafter.

SUSPENSION OF DOCUMENT DESTRUCTION

The Company has a duty to preserve documents when litigation, an audit or a government investigation is anticipated. During that period, the documents shall be retained till the disposal of litigation, audit or investigation as the case may be.

DESTRUCTION OF DOCUMENTS

All the documents retained as per the above Schedule and on expiry of the relevant period shall be destroyed by way of shredding. There shall be maintained a register to record the destruction of documents and duly initialled by the respective head of the departments whose respective department’s documents are destroyed.

In case of conflict between this policy and existing policies mentioned under the delegation of authorities, the provisions of this policy will prevail.

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