



FRONTLINE SECURITIES LIMITED

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DOCUMENT PRESERVATION POLICY

FRONTLINE SECURITIES LIMITED

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Approved by the Board of Directors	On behalf of the Board of Directors Mr. Yatandra Singh Pal (Company Secretary)

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FRONTLINE SECURITIES LIMITED

DOCUMENT PRESERVATION POLICY

1. Preamble

The Board of Directors (the "**Board**") of Frontline Securities Limited (the "**Company**" or "**FSL**") has adopted this policy (the "**Policy**") with respect to the preservation and destruction of documents and other records of the Company, both in hard copy and in electronic form (hereinafter referred to as "**Documents**"). The Policy shall be applicable to the Company.

2. Policy and Purpose

This Policy is framed as per the requirement of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 notified on 2nd September 2015 and effective from 1st December 2015.

CA 2013 and other applicable laws requires the Company to maintain certain types of corporate records, usually for a specified period of time or permanently. Purposes of the Policy is to establish a policy on (a) preservation, retention and maintenance of Documents necessary for the proper functioning of the Company and to ensure legal compliances and (b) destruction of documents which no longer need to be retained.

3. Definitions

- (a) "**Board**" means Board of Directors of the Company.
- (b) "**CA 2013**" means the Companies Act 2013 as amended from time to time.
- (c) "**Company**" shall mean Frontline Securities Limited
- (d) "**Document**" 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.
- (e) "**Electronic Form**" means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- (f) "**Maintenance**" means keeping documents, either physically or in electronic Form.

- (g) "Preservation" means to keep documents in good order and to prevent from being altered, damaged or destroyed.
- (h) "Regulations" means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 notified on 2nd September 2015 and effective from 1st December 2015.

4. Preservation of Documents

CA 2013, the Regulations and other applicable laws requires the Company to maintain certain types of Documents on a permanent basis or for a specific period of time. Other than the Documents which are legally require to be preserved, there are many other Documents which are also important to the business and conduct of the Company. Therefore, all the Documents of the Company must be preserved, retained and maintained as follows:

All the Documents listed in '**Schedule A**' to this Policy shall be preserved permanently and All the Documents listed in '**Schedule B**' shall be preserved temporary (All the Documents preserved for a period of not less than eight years after completion of the relevant transactions or creation of the Document whichever is earlier).

Documents may be preserved either in electronic mode and/or physical mode.

5. Custody of the Documents

Subject to the Applicable Law, the custody of the Documents shall be with the Company Secretary / Authorised Person of the Company. In case the Company Secretary or Authorised Person tenders resignation or is transferred from one location of the Company to another location, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession to any other person as authorised by the Board of Directors under this Policy. The Board may authorise such other person as it may deemed fit as the Authorised Person.

6. Destruction of Documents

The documents after the retention period may be destruct/ Disposed off/ destroyed in the manner as prescribed under annexure -I.

7. Amendment

Notwithstanding anything contained in this Policy the Board shall have the power to amend this Policy at any time.

SCHEDULE A

DOCUMENTS WHICH SHALL BE PERMANENTLY PRESERVED

Permanent Preservation

Companies Act, 2013

- The Memorandum of Association and Articles of Association of the company
- Register of members
- Register of charges
- Register of Duplicate Certificate
- Register of Contract and arrangement in which directors are Interested
- Books and Documents relating to the issue of share certificates, including the blank forms of share certificates (For minimum 30 Years)
- Minutes of Board Meeting
- Minutes of General meeting

SCHEDULE B

DOCUMENTS WHICH SHALL BE TEMPORARY PRESERVED

Companies Act, 2013:

- Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)
- All notices pertaining to disclosure of interest of directors
- All certificates surrendered to a company (3 years from date of surrender)
- Instrument creating a charge or modification, If any, (8 years from date of satisfaction of charge)
- Books of Account together with the Voucher relevant to any entry in such books of Account (not less than 8 years)

ANNEXURE - I

Format of Destruction of Documents after completion of Retention Period

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF APPLICABLE LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON