Policy on preservation of Documents

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1. Legal Framework

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") imposed certain obligations and disclosure requirements on all the listed entities, one of the common obligation for all the listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents.

The Board of Directors of Lactose (India) Limited (the "Company") is obliged to formulate a policy for "Preservation of Documents" to comply with the requirements of Regulation 9 of the Listing Regulations.

This Policy will be applicable to the Company effective 1 December, 2015.

2. Definitions

1. "Board" Board means "Securities and Exchange Board of India."

2. "Company" Company means "Lactose (India) Limited "

3. "Documents" Documents means all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.

4. "Listing Regulations" Listing Regulations means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

3. Objective

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in at least two following categories as follows:

- Documents whose preservation shall be permanent in nature;
- Documents with preservation period of not less than eight (8) years after completion of the relevant transactions.

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

4. Provision with regard to Preservation of Documents under various Laws

Sr. no.	Name of the Document	Regulation Reference
1	Shareholding Pattern	31 (1) (b)
2	Quarterly Financial Results	33 (3) (a)
3	Annual Financial Results	33 (3) (d)
4	Annual Report	34(1)

Documents whose preservation shall be permanent:

5	Shareholding Pattern in case of Capital Restructuring	31 (1) (c)
6	Voting Results by Shareholders	44 (3)
7	Draft Scheme of Arrangement	37 (2)
8	Yearly Disclosure of shareholding of Promoters	30 (2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulation, 2011
9	Development/ Intellectual property and Trade Secretes	Intellectual Property Act
10	Electronic Mail	
11	Board and Committee Meeting Minutes	Companies Act, 2013
12	Statutory Registers	Companies Act, 2013

Preservation of Documents for 8 years:

Sr. no.	Name of the Document	Regulation Reference
1	Statement under Grievance Redressal Mechanism	13(3)
2	Corporate Governance Report	27(2)(a)
3	Statement of deviation or variation in use of issue proceeds	32(1)
4	Compliance Certificate to the exchange about the share related activities maintained by RTA registered with SEBI	7(3)
5	Compliance Certificate w.r.t. Transfer or transmission or transposition of securities within 30 days	40(10)
6	Listing Fees	14
7	Intimation of appointment of Share Transfer Agent	7(5)
8	In-principle approval prior to issue of securities	28(1)
9	Prior Intimations of Board Meeting for financial Result	29(1)(a)
10	Prior Intimations of Board Meeting for Buyback, voluntary delisting etc	29(1)(b), 29(1) (c), 29(1)(d), 29(1) (e) and 29(1) (f)
11	Prior Intimations of Board Meeting for alteration in nature of	29(3)

	securities	
12	Disclosure of Price Sensitive Information	30(6)
13	Shareholding Pattern prior to listing of securities	31(1)(a)
14	Record date or Date of closure of transfer books	42(2)
15	Record date for declaring dividend and /or cash bonus	42(3)
16	Change in name of listed entity	45(3)
17	Disclosure of information or events	30
18	Reconciliation of Share Capital Audit Report	55A of SEBI (Depositories and Participants) Regulations, 1996
19	Disclosures under Code of Internal Procedures And Conduct For Regulating, Monitoring And Reporting Of Trading By Insiders	10 (1)
20	Tax Records	Income Tax Act
21	Legal Files	
22	Contracts	Contract Act

5. Mode of Preservation of Documents

The documents specified in Item Nos. 4 shall be kept in electronic mode and/or Physical mode as decide by the Board time to time.

6. General

Notwithstanding anything contained in this Policy, the Company shall ensure to comply 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.

7. 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.
