



NEWEVER TRADE WINGS LIMITED

formerly: Newever Infrahomes Limited
CIN No. L74999-WV-012PI-C181108

POLICY ON PRESERVATION OF DOCUMENTS UNDER SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS 2015

PREAMBLE:

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (Hereinafter called as "The Regulations") every listed Company shall frame a policy on preservation of documents either in physical or in electronic mode. This policy *inter alia* provides for preservation of documents where such preservation shall be of permanent nature as also documents with preservation period of not less than eight years after completion of the relevant transactions to which such document relates.

PURPOSE OF THE POLICY:

The purpose of this policy is to establish the framework needed for effective management of the documents and set of principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical.

A good document preservation program is fundamental to the Company's commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents.

This policy seeks to ensure that all the necessary documents and records of the Company either in physical or in electronic mode 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.

This policy is framed as per requirement of Regulation 30 (4) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

DEFINITIONS

- a) Act: "Act" means the Companies Act, 2013 including any amendment or modification thereof.
- b) Board: Board means Board of Directors of the Company.
- c) Company: "Company" means Newever Trade Wings Limited.
- d) Document: "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the





NEWEVER TRADE WINGS LIMITED

formerly, **Newever Infrahomes Limited**

CIN No. L74999WB2013PLC181108

Companies Act 2013, SEBI Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

- e) Employees: "Employees" shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.
- f) Regulations: "Regulations" shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015
- g) Secretarial Standards: "Secretarial Standards" means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.
- h) Stock Exchange: "Stock Exchange" shall mean BSE Limited.
- i) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

GOVERNING LAWS

This policy shall be governed by the Companies Act 2013, SEBI Act, Securities Contract Regulation Act, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

POLICY

CREATION OF DOCUMENTS

All employees of the Company are required to create accurate documents regarding their respective matters. The documents should:

- a) facilitate necessary action by employees and their successors at any level at all points of time;
- b) facilitate proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;
- c) protect the financial, legal and other rights of the organisation, its clients and any other people affected by its actions and decisions.

MAINTAINENCE OF DOCUMENTS

Every member of the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transactions and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed time limit.

- a) Digital documents can be maintained in forms such as emails, web pages or database records, plus scanned versions of papers that have been digitised in business processes.
- b) Physical documents to be maintained in books and files.
- c) All digital and physical records to be saved at the registered office of the Company and no physical records can be migrated without permission of the respective Department Head.





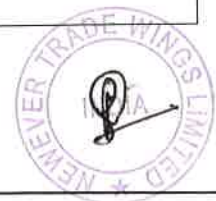
NEWEVER TRADE WINGS LIMITED

formerly, **Newever Infrahomes Limited**
CIN No. L74999W9001201000100

DISPOSAL AND DESTRUCTION OF DOCUMENTS

- All documents mentioned in Category A which are permanent in nature and need to be permanently preserved by the Company during its entire life time. Utmost care is to be taken to ensure that files are well preserved. However, all documents mentioned in Category B are temporary in nature must be preserved for a period not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed.
- The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the by the Department Head for the purpose. Inspection of this register is restricted.

Sr. No.	Category A	Category B
1	Statutory registers and records maintained under the Companies Act, 2013	VAT/Sales Tax Records
2	Annual Report, Directors Report, Auditors Report, Secretarial Report and other such report as required.	Tax Deducted at Source Records
3	Minute books, Notices, Agendas and other related papers of Board Meeting, General Meeting and Committee Meetings.	Income Tax papers
4	All documents required under the Listing Agreement	Books of Accounts, Ledgers and Voucher
5	Documents pertaining to NSDL, CDSL, SEBI, and Stock Exchange.	Bank Statements and other related documents.
6	All e- forms and other documents as required to file with Registrar of Companies and other regulatory Authorities.	Non-statutory registers under the Companies Act, 2013
7	Records of all Contracts and Arrangement if any.	Annual Plans and Budgets
8	Memorandum of Associations, Articles of Association, Common Seal, Share certificates, adopted policies, codes and other related documents.	Litigation files if any
9	Orders and approvals of all Regulatory Authorities.	Employees records
10	Disclosures, Declarations as required under Companies Act, 2013, Listing Agreement, SEBI (Prohibition of Insider Trading) Regulations, 2015, SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and other such regulation as may required.	Other miscellaneous documents as may required.
11	News Paper Publications.	





NEWEVER TRADE WINGS LIMITED

formerly, Newever Infrahomes Limited
CIN No. L74999WV92012PLC181106

12	Documents on which the common seal of the company has been affixed.	
13	Other Secretarial records	
14	Records pertaining to various other laws for time being in force.	
15	All confidential Agreements of Non Disclosure nature.	

AMENDMENTS TO THE POLICY

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

Note: The above said policy was approved by the Board of directors at their meeting held on 14th November, 2015 and will be applicable to the Company with effect from 1st December, 2015 in terms of regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

