

HI-KLASS TRADING & INVESTMENT LTD.

Regd. Off. :24, Veer Nariman Road, Rehman Building, 2nd Floor, Office No.15, Fort, Mumbai – 400 001.

Tel.: 2287 4084, 2287 4085 * Email : info@hiklass.co.in
CIN-L51900MH1992PLCO66262

POLICY FOR PRESERVATION OF DOCUMENTS

1. PREFACE

M/s. Hi-Klass Trading and Investment Limited (the “Company”), has always been committed to ensure safekeeping of the records and documents as a good corporate governance practice, for such minimum period as may be required under various applicable laws and at the same time destroy the documents which are no longer required to avoid extra inventory of documents. Therefore, the Company formulates this policy, in pursuance of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Regulation 9 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, (hereinafter referred as Listing Regulations) requires that a listed entity shall formulate a policy on preservation of the documents.

Further, Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information, which have been disclosed to stock exchange(s) under Regulation 30, shall be hosted on the website of the Company for a minimum period of five years, and thereafter as per the archival policy of the Company, as disclosed on the website.

Besides the above, as per the applicable provisions of the Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

Accordingly, the Company has framed this policy on preservation of documents and archival (“Policy”) in pursuance of Regulation 9 and Regulation 30 of the Listing Regulations.

2. DEFINITIONS

“Act” means the companies Act, 2013 and rules made thereunder;

“Applicable Law” means any law, rules, circulars, guidelines or standards issued by the Securities Exchange Board of India, Ministry of Corporate Affairs (MCA) and the Institute of Company Secretaries of India (ICSI) and any other regulatory body or authority in relation to preservation of documents;

“Board” means the Board of Directors or its’ committees; “Book and/or paper” means as defined in Section 2(12) of the Act, and include books of account, deeds, vouchers, writings, documents, minutes and registers maintained on papers or in electronic form.

“Books of Account” means as defined in Sub-section (13) of Section 2 of the Companies Act, 2013 and includes records maintained in respect of –

- (i) All sums of money received and expended by a Company and matter in relation to which the receipt and expenditure take place;
- (ii) All sales and purchases of goods and services by the Company;
- (iii) The assets and liabilities of the Company; and
- (iv) The items of cost as may be prescribed under section 148 in the case of a Company which belongs to any class of companies specified under that section;



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“Company” means Hi-Klass Trading and Investment Limited;

“Document” means as defined in Sub-section (36) of Section 2 of the Act that includes summons, notices, requisitions, order, declaration, form and register, agreements and memorandum of understanding, papers, certificates, records, contracts, files, books, letters, tapes, CDs, DVDs, electronic storage devices, etc. whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

“Electronic Form” with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device;

“Financial statement” means as defined in Section 2(40) of the Act which includes—

- i) A balance sheet as at the end of the financial year;
- ii) A profit and loss account,
- iii) Cash flow statement for the financial year;
- iv) A statement of changes in equity, if applicable;
- v) Any explanatory note annexed to, or forming part of, any document referred to in sub-clause (i) to sub-clause

“Listing Regulations” means the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

“Memorandum” as defined in Sub-section (56) of Section 2 of the Act means the memorandum of association of a Company as originally framed or as altered from time to time in pursuance of any previous Company law or of this Act;

“Officer” as defined in Sub-section (59) of Section 2 of the Act includes any director, manager or key managerial personnel or any person in accordance with whose directions or instructions the Board of Directors or any one or more of the directors is or are accustomed to act;

“Postal ballot” as defined in Sub-section (65) of Section 2 of the Act means voting by post or through any electronic mode;

“Prospectus” as defined in Sub-section (70) of Section 2 of the Act means any document described or issued as prospectus and includes a red herring prospectus referred to in section 32 or shelf prospectus referred to in section 31 of the Act or any notice, circular, advertisement or other documents inviting offers from the public for the subscription or purchase of any securities of a body corporate;

“Preservation” means to keep documents in good order, either physical or in electronic Form for future reference.

“Registers” means as defined in Section 2(74) of the Act and include register of companies maintained by the Registrar on paper or in electronic mode under this Act; Words and expressions used and not defined herein in the policy but defined in Securities Contracts (Regulation) Act, 1956 or the Securities and Exchange Board of India Act, 1992 or the Depositories Act, 1996 shall have the same meanings respectively assigned to them in those Acts..



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3. ROLE AND RESPONSIBILITY

The respective Departmental/Division heads of the Company shall be responsible for maintenance and reservation of documents in terms of this policy and to report thereon to the Audit Committee periodically, and the Committee shall review those report and decide the category for preservation of documents.

4. SCOPE AND COVERAGE

This policy intends to provide guidance to its' officers for maintenance of any document, their preservation and disposal and classify those documents in two broad categories:-

- i) Documents whose preservation shall be permanent as provided in Schedule "A";
- ii) Documents whose preservation not necessarily be required beyond eight years as provided in Schedule "B"

Schedule "A"

Sl. No.	Description of Documents	Reference
1	Memorandum & Articles of Association of the Company	Section 4 & 5 and Sec 17 of the Act
2	Register of members commencing from the date of registration of the Company	Sec. 88 of the Act
3	Index of Members	Sec 88 of the Act
4	Register of Debenture Holders	Sec 71 of the Act
5	Register of Share Transfer / Transmission with Transfer Deeds & Documents	Sec 56 of the Act
6	Register of Unclaimed Shares/ Securities	Sec 124(6) of the Act
7	Register of Charge & Mortgage	Sec 81 of the Act
8	Register of Fixed Assets with title documents	Sec 128 of the Act
9	Register of Loan, Investments & Guarantee	Sec 186(10) of the Act
10	Register of Contracts	Sec 189(4) of the Act
11	Register of Directors & KMP(s)	Sec 170 (1) of the Act
12	Minutes Book of Board Meetings	SS-1 (Reg. 8) Sec 118
13	Minutes Book of Committees' Meetings of Board	Sec 118 of the Act
14	Minutes of all shareholders meeting, postal ballot, e-voting	SS-2 (Reg. 18) Sec 118 of the Act
15	Shareholding pattern	Reg. 31(1)(b) of Listing Regulations
16	Register of Issue of Duplicate shares	Sec 46(3) of the Act
17	All other documents which are required to be maintained permanently in terms of applicable laws, rules and regulations;	



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Schedule "B"

Sl. No.	Description of Documents	Reference
1	Books of Accounts	Sec 128
2	Cost Audit Records	Sec 148
3	Internal Audit Records	Sec 138
4	Financial Statements	Sec 129
5	Postal Ballot	Sec 110
6	Prospectus	Sec 31, 32
7	Copies of Annual Return filed with ROC Sec 92	Copies of Annual Return filed with ROC Sec 92
8	Forms & Papers filed with Registrar of Companies and other Regulatory Authorities Sec 117	Forms & Papers filed with Registrar of Companies and other Regulatory Authorities Sec 117
9	Notice with Agenda papers sent to Directors for Board and Committee meetings Sec 173	Notice with Agenda papers sent to Directors for Board and Committee meetings Sec 173
10	Records of shareholders for Unpaid / unclaimed Dividend Sec 124/ 125	Records of shareholders for Unpaid / unclaimed Dividend Sec 124/ 125
11	Statement under Grievance Redressal Mechanism Reg. 13(3)	Statement under Grievance Redressal Mechanism Reg. 13(3)
12	Corporate Governance Report Reg. 27(20(a)	Corporate Governance Report Reg. 27(20(a)
13	Compliance certificate issued by RTA regarding Share related activities	Reg. 7(3)
14	Compliance Certificate w.r.t. Transfer or transmission or transposition of securities within 30 days	Reg. 40(10)
15	Proof of payment of Listing fees	Proof of payment of Listing fees
16	Prior intimation of Board meeting for financial results	Reg. 29(1)(a)
17	Prior intimation of Board meeting for buy back, voluntary delisting etc	Reg. 29(1) (b)- (f)
18	Prior intimation of Board Meeting for alteration in nature of securities	Reg. 29(3)
19	Disclosure of Price Sensitive Information	Reg. 30(6)
20	Shareholding pattern prior to listing	Reg. 31(10)(a)
21	Record date or date of transfer of books	Reg. 42(2)
22	Record date for dividend / cash bonus	Reg. 42(3)
23	Change in name of listed entity	Reg. 45(3)
24	Disclosure of event/ information	Reg. 30
25	Reconciliation of Share capital Audit Report	Reg. 76 of the SEBI (Depositories and Participants) Regulations, 2018
26	Disclosure under Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by insiders	Reg. 10(1)



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27	All other Registers & Records under the Companies Act, 2013 which are required to be maintained upto maximum 8 years in terms of applicable laws, rules and regulations	
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5. DOCUMENTS TO BE MADE AVAILABLE ON THE WEBSITE OF THE COMPANY

5.1 As required under the Listing Regulations, the Company shall maintain a functional website containing:

- the basic information about the Company;
- all information and/or documents as specified in the applicable provisions of the Companies Act, 2013;
- all information and/or documents as specified in Regulation 46 (2) of the Listing Regulations;
- all information and/or documents as mentioned in Regulation 30 of the Listing Regulations on Material Events;
- all other Information and/or documents as required under the Listing Regulations.

5.2 The Company shall ensure that the contents of the website are correct.

5.3 The Company shall update any change in the content of its website within two working days from the date of such change in content.

5.4 The information and/or documents uploaded on the website shall be available for the current financial year and for the preceding five financial years.

6. ARCHIVAL OF DOCUMENTS

Documents maintained/preserved by the Company, as mentioned in Part - I, shall be maintained/ preserved in the following manner

A. Documents maintained in physical form:

1. All information and/or documents pertaining to the current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
2. All documents pertaining to the period prior to the preceding financial year, shall be kept in good condition at least up to the minimum for their maintenance period specified for their maintenance / preservation as mentioned in the Annexures attached hereto. The said records should be also maintained in such a manner that their retrieval is easy and quick.

B. Documents maintained in electronic form:

1. All documents pertaining to the current financial year and for the preceding financial year shall be maintained on server/cloud, and backup be maintained on scheduled time and day. The documents shall be maintained in such a manner that their retrieval is easy and quick.
2. Back up of all documents pertaining to the period prior to the preceding financial year shall also be maintained on server in good condition at least up to the minimum period specified for their maintenance/ preservation. The said records should be also maintained in such a manner that their retrieval is easy and quick.
3. After the expiry of the time mentioned in Clause 5.4 of this Policy (i.e., five financial years preceding the current financial year), the information be and/or document shall be removed from the main website. The backup of said information and/or document, which is removed from the main website, shall be maintained/ preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years, the backup may be permanently removed from the server

7. DISPOSAL OF DOCUMENT

The registers/documents mentioned above may be destroyed in accordance with the provisions of the Act and the



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Listing Regulations and the Applicable Law, after the approval of the Board of Directors of the Company and in the presence of the Company Secretary and the CFO.

The Board of Directors shall review, at least once in every three years, the list of documents that may be destroyed.

The Company shall maintain a Register of Records and Documents Destroyed, containing the particulars of the documents destroyed, the year to which it pertains, mode of destruction, etc., each entry in this register shall be verified by the Company Secretary and countersigned by the CFO.

8. EXCLUSION

Documents/records in respect of which any investigation/enquiry is pending, or in respect of which any legal proceeding is pending, or which is part of any legal dispute, are not covered under this Policy.

9. AMENDMENTS

The Board of Directors shall have the right to amend, modify and change this Policy in part or the entire Policy, at any time, as it may deem fit in accordance with the applicable laws. Any change/amendments in applicable laws with regard to maintenance and preservation of documents and records shall be deemed to be covered in this Policy.

This Policy was adopted by the M/s. Hi-Klass Trading and Investment Limited which was appropriately amended subsequently by the Board of Directors of the Company at its meeting held on August 08, 2024.

