

Varroc Engineering Ltd.

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Website www.varroc.com
CIN U28920MH1988PLC047335



POLICY FOR PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS

[Pursuant to SEBI (Listing Obligations and Disclosure Requirements), 2015]



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EXCELLENCE

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A. Document Control

Document Name	Policy for preservation of documents and archival of documents
Version No.	1
Date of publication	[DD / MM / YYYY]
Planned review date	[DD / MM / YYYY]
Process Owner	
Approval By	Board of Directors

B. Revision History

Version	Date of issue	Reason for change
1	DD / MM / YYYY	Policy adopted (effective since listing of Varroc Engineering Limited)
2	07/02/2023	Periodic Review
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4		
5.		
6.		
7.		
8		

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1 GENERAL

This policy deals with preservation of corporate information and archival of documents and is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Listing Regulations”) and various provisions of the Companies Act, 2013 and the Rules made thereunder, the Secretarial Standards and any other Law, Rules, Regulations as may be applicable to the Company from time.

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents approved by its Board of Directors, classifying them in at least two categories as follows:

- (a) documents whose preservation shall be permanent in nature.
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions.
- (c) documents with preservation period other than those mentioned above.

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

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 its 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, this policy has been framed, keeping in view particularly the requirements of the Listing Regulations and the provisions of the Companies Act, 2013.

2 EFFECTIVE DATE

This Policy is effective from the date of listing of Equity Securities of the Company on the Stock Exchange.

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Where the terms of this Policy differ from any existing or newly enacted laws, rules, regulations, or standard governing preservation of records or archival of records as applicable to the Company, such laws, rules, regulations or standards will take precedence over this Policy until this Policy is changed to conform to the requirements under such law, rules, regulations or standards.

3 OBJECTIVES

The primary object of this policy is to determine the period for preservation of records/documents of the Company i.e., all papers or electronic records, including but not limited to, memoranda, contracts, e-mails, time sheets, effort estimates and expense records based on their reference value and statutory requirements. In determining such period, the following aspects have been considered:

- Company's own information retrieval needs (reference value);
- Statutory requirements under respective statutes;
- Litigation requirements;
- Ease of retrieval;
- Optimal use of storage space and cost of preservation;
- Timely sanitation of obsolete records

4 DEFINITIONS

In this policy, unless the context otherwise requires –

- a. **“Act”** means the Companies Act, 2013 and the rules made there under, as amended from time to time.
- b. **“Listing Regulations”** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time.
- c. **“Company”** means Varroc Engineering Limited and its Subsidiary Companies/ Group Companies/Associate Companies.
- d. **“Document”** includes summons, notice, requisition, order, declaration, form and register, agreements, and memorandum of understanding 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;
- e. **“Key Managerial Personnel”** or **“KMP”** shall have the same meaning described to it under the Act.

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- f. **“Board”** or **“Board of Directors”** shall mean the Board of Directors (including the Board committees) of the Company, as may be re-constituted from time to time. **“Financial Year”** shall have the same meaning described to it under the Act.
- g. **“Electronic Form”** with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, microfilm, computer generated micro fiche or similar device.
- h. **“Website”** shall mean Company’s website i.e., www.varroc.com.

The words or expressions used but not defined herein but defined under Act or the Listing Regulations shall have the same meaning assigned therein.

5 SCOPE

These guidelines will be valid for determining the preservation period for commercial and legal records and will be applicable to all the locations of the Company and its Group Companies/Subsidiaries/Associate Companies.

6 PRESERVATION POLICY

The following documents required to be prepared and maintained under the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be preserved for such period as mentioned against each item in the table.

Annexure 1 of this policy contain the details of documents whose preservation shall be permanent in nature.

Annexure 2 of this policy contain the details of documents whose preservation shall be for a minimum period of 8 years or as may be mentioned against each item.

8 MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form. The preserved Documents must be accessible at all reasonable times. The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction, or anything which endangers the content, authenticity, utility, or accessibility of the Documents, other than disposal of Documents as permitted under this Policy.

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i) Documents maintained in physical form:

All information and/or documents shall be kept handy and maintained in such a manner that their retrieval is easy and quick. It shall be kept in good condition at least up to the minimum period specified for their maintenance.

ii) Documents maintained in electronic form:

All documents shall be maintained on server 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.

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fireproof or other such secure cabinets.

Custody of the Documents: Subject to the Applicable Law, the custody of the Documents shall be with the relevant Authorised Person. Where the Authorised Person tenders his resignation or is transferred from one location of the Company to another or is otherwise no longer employed with the Company, 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 under the Policy to the new head of such department or the concerned person. Information of the cessation or transfer of the Authorised Person shall also be intimated to the CS and information technology department of the Company. The Authorised Person will co-ordinate with the IT Department of the Company to ensure Preservation of Documents in electronic form, as appropriate.

9 DOCUMENTS TO BE MADE AVAILABLE ON THE WEBSITE OF THE COMPANY AS REQUIRED BY THE COMPANIES ACT, 2013 AND THE LISTING REGULATIONS

- 9.1. 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) and 62 (1) of the Listing Regulations,

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- 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,

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

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

9.4. Information and/ or Documents that need to be made available under Regulation 30 of the Listing Regulations shall be made available on the website simultaneously with disclosure to Stock Exchanges.

9.5. The information and/or documents uploaded on the website shall be available for the current Financial Year and for the preceding five Financial Years.

9.6. Information and/ or Documents shall be arranged under proper heads and sub heads in such a manner that they can easily be located/ searched by the viewers, viz.

- The information and/or documents may be arranged Financial Year-wise with further segregation into the four quarters of the Financial Year.
- All policies etc. or the information/ documents of a general nature can be clubbed together at one place.

10 ARCHIVAL OF DOCUMENTS

Documents maintained/preserved by the Company, as mentioned in the above paras, shall be maintained/ preserved in the following manner:

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 period specified for their maintenance / preservation as mentioned in the Annexures attached hereto. The

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said records should be also maintained in such a manner that their retrieval is easy and quick.

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, 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.

Documents made available on the Website of the Company:

After the expiry of time mentioned in Clause 9.5 of this policy (i.e., five Financial Years preceding the current Financial Year), the information 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.

11 PRESERVATION OF CORPORATE POLICIES

The Company shall preserve permanently the various policies framed under the Companies Act, 2013 and the Listing regulations from time to time viz:

- i. Code of Conduct & Ethics for the Board and Senior Management
- ii. Code of Conduct for Fair Disclosure of Unpublished Price Sensitive Information
- iii. Code of Conduct to Regulate, Monitor & Report Trading by Insiders
- iv. Whistle Blower Policy
- v. Policy on Related Party Transactions
- vi. Corporate Social Responsibility Policy
- vii. Remuneration policy for Directors, Key Managerial Personnel and other employees
- viii. Board Evaluation Framework
- ix. Material Subsidiary Policy
- x. Policy on Prevention of Sexual Harassment

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- xi. Risk Management Policy
- xii. Policy on Preservation of Documents
- xiii. Dividend Distribution Policy
- xiv. Policy for Determination of Materiality Threshold
- xv. Any other policy at the discretion of the Company

12 DISPOSAL OF REGISTERS/DOCUMENTS

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short-term use only. This applies to both physical and electronic Documents. The registers/documents mentioned above may be destroyed in accordance with the provisions contained in the Act and the SEBI Laws after approval of the Board and in the presence of the Company Secretary and the Group CFO.

The Board shall review, at least once in every three years or lesser period as may be decided by the Board, the list of documents that may be destroyed. The Authorised Person shall exercise due diligence while destroying any Documents, including seeking confirmation from other relevant departments to the extent necessary. If needed, The functional head of the IT department shall also make appropriate provision for back up for Electronic Records.

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 Group CFO. The register of disposal of records shall contain the following columns:

- a) Item Number;
- b) Brief Particulars of the records disposed of;
- c) Date of approval for disposal of records;
- d) Date of disposal; and
- e) Mode of destruction

This register of disposal of records shall be maintained permanently by the Company with the assistance of the Compliance Officer either in physical or electronic form. The concerned employee shall be responsible for taking in to account the potential impact on preservation/destruction of the documents in their work area and their decision to retain/preserve/destroy documents pertaining to their area of work.

13 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.

14 DISCLOSURE

This Policy shall be placed on the website of the Company.

15 REVIEW

The policy has been approved by the Board of Directors of the Company. The Board, however, may review this policy as and when it deems appropriate. The Board of Directors can amend this Policy, as and when deemed fit. This policy is being formulated keeping in mind the applicable Laws, Rules, Regulations and standards in India. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. If there is an amendment in such laws, rules, regulations and standards, allowing standards, then this Policy shall be deemed to have been amended to the extent of such amendment. Also, if due to subsequent amendment in the laws, this Policy or any part hereof becomes inconsistent with the law, the provisions of law shall prevail and this Policy shall be deemed to be amended to that extent. The Policy shall be placed on the Company's Website.

Date of Updation/Review: February 7, 2023
Place: Aurangabad

Chairman and Managing Director

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ANNEXURE-1

Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
1	Copies of all documents and information as originally filed under section 7(1) (incorporation) till dissolution under the Companies Act, 2013	Registered office	Company Secretary or any other person authorized by the Board for the purpose.	Sec 7(4) of the Companies Act, 2013	Permanent, till dissolution of the Company
2	i. Register of Renewed and Duplicate Share Certificates, cancelled certificates for dematerialisation ii. Share certificate related books and documents	Registered office of the company or at such other place where the Register of Members is kept	Company Secretary or any other person authorized by the Board for the purpose.	i. Rule 6 (3) of Companies (Share Capital and Debenture) Rules, 2014 ii. Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	i. Permanent ii. 30 (thirty) years
3	Share certificate forms and related books and documents – Disputed cases	At the premises of Registrar & Share Transfer Agent	Company Secretary or any other Director authorised for the purpose	Rule 7 (3) of the Companies (Share Capital and Debenture) Rules, 2014	Thirty Years and in disputed cases permanently, cancelled certificate – 3 years
4	Register of Charges	Registered office	Company Secretary	Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	Permanent

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Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
5	Register of Members along with the index (Form MGT-1) (having details inter alia Name, Address, Folio No, Number of Shares, Distinctive numbers, Certificate numbers, etc.) under due certification at the end of each quarter of a financial year	At the premises of Registrar & Share Transfer Agent	Company Secretary or any other person authorized by the Board for such purpose or by Registrar & Share Transfer Agent	Rule 15(1) of the Companies (Management and Administration) Rules, 2014 SEBI Circular no. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated 20 th April, 2018	Permanent
6	Foreign Register of Members	At the premises of Registrar & Share Transfer Agent	Company Secretary or person authorised by the Board	Rule 15 (4) of the Companies (Management and Administration) Rules, 2014	Permanent
7	Minutes of proceedings of General Meeting and Resolutions passed by Postal Ballot, meeting of Board of Directors, creditors, committees of the Board and resolutions passed by Circulation. In case of merger or amalgamations, minutes of all meetings of the	Registered office	Company Secretary	Rule 25(1)(d) & € of the Companies (Management and Administration) Rules, 2014 and Secretarial Standards 1& 2 – clause 8.1& 18.1	Permanent

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Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
	transferor company, as handed over to the company				
8	Register u/s 186 of the Companies Act, 2013 (loan/guarantee/ security or making an acquisition of securities) Form MBP-2	Registered Office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 12(3) of the Companies (Meetings offboard and its Powers) Rules,2014	Permanent
9	Register u/s 187 of the Companies Act, 2013 (investment held in the name of any other person) Form MBP-3	Registered Office	Company Secretary	Rule 14(3) of the Companies(Meetings offboard and its Powers) Rules,2014	Permanent
10	Register u/s 189 of the Companies Act, 2013 (Register of contracts or arrangements in which directors are interested as per section 184 & 188 of the Act)	Registered Office	Company Secretary or any other person authorised by the Board for the Purpose	Rule 16(3) of the Companies (Meetings offboard and its Powers) Rules,2014	Permanent
11	Minutes of all the general, Board & Committee Meetings of the transferor Company as handed over along with Register of	Registered office for General Meeting minutes	Company Secretary	8.1& 18.1(SecretarialStandards-1 & 2)	Permanent

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Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
	Directors Attendance in Board Meeting and Committee Meetings to the transferee company				
12	Register of Directors and KMP and their shareholding	Registered Office	Company Secretary or any person designated by the Board	Section 170 of the Companies Act, 2013	Permanent
13	Register of Records and Documents destroyed	Registered Office	Company Secretary or any person authorised by the Board	SEBI Listing Regulations	Permanent
14	Such other registers/records as are required to be maintained under this Act.	Registered Office	Company Secretary or any person authorised by the Board	Companies Act and SEBI Listing Regulations	As per applicable provisions
15	Original Purchase and Sale Agreements	Registered Office	Company Secretary or any person authorised by the Board	Applicable property laws and Company Policy	Permanent
16	Property Card, Ownership records issued by government Authority	Registered Office	Company Secretary or any person authorised by the Board	Applicable property laws and Company Policy	Permanent

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ANNEXURE 2

A- Under the Companies Act, 2013 & in General

Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
1.	Instrument creating charge or modification thereon	Registered Office	Company Secretary	Rule 10(4) of the Companies (Registration of Charge) Rules, 2014	8 years from the date of satisfaction of charge by the company
2.	Copies of all annual returns prepared under section 92 and copies of all certificates and documents required to be annexed thereto	Registered Office	Company Secretary	Rule 15 (3) of the Companies (Management and Administration) Rules, 2014	8 years from the date of filing with the Registrar of Companies.
3.	All notices for disclosure of concern/ interest received u/s 184 of the Companies Act, 2013 (Form MBP-1), any other declarations of Directors	Registered Office	Company Secretary or any other person authorised by the Board for the purpose.	Rule 9(3) of the Companies (Meetings of Board and its Powers) Rules, 2014	8 years from the end of the Financial Year to which it relates
4.	Notice of disclosure of interest by the Directors, officers and substantial shareholders under Model Code of Conduct.	Registered Office	Company Secretary	Schedule IV	8 Financial Years

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Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
5.	The attendance register of Board & Committee Meetings	Registered Office	Company Secretary	4.1.7 of Secretarial standards -1	8 Financial Years
6.	Office copies of Notices, Agenda, Notes on Agenda of the Shareholders, Board and its Committee meetings, scrutinizer's register, scrutinizer's report and other related papers	Registered Office	Company Secretary	8.2 of Secretarial Standards-1	As long as they remain current or for 8 Financial Years whichever is later
7.	Office copies of general meeting Notices, scrutinizers report and other related papers of the company	Registered Office	Company Secretary or any other person authorized by the Board for the purpose.	18.2 (Secretarial Standards-2)	As long as they remain current or for 8 Financial Years whichever is later
8.	In case of merger or amalgamation, Office copies of Notices, Agenda, Notes on Agenda, scrutinizer's register, scrutinizer's report and other related papers of the transferor company, as handed over to the Company;	Registered Office	Company Secretary or any other person authorized by the Board for the purpose.	Secretarial Standard SS-1	As long as for 8 Financial Years whichever is later

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Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
9.	Register of debenture holders or any other security holders (MGT-2) along with index-from the date of redemption of debentures or securities;	At the premises of Registrar & Share Transfer Agent	Company Secretary or Registrar & Share Transfer Agent	Rule 4 of The Companies (Management and Administration) Rules, 2014	8 years from the date of redemption of debentures or securities
10.	Foreign Register of Debenture holders or any other security holders along with the index	At the premises of Registrar & Share Transfer Agent	Company Secretary or Registrar & Share Transfer Agent	Rule 7 of The Companies (Management and Administration) Rules, 2014	Permanent
11.	Any other register /documents required by any law, for the time being in force	Registered Office	Company Secretary		8 Financial Years
12.	Books of Accounts together with the vouchers relevant to any entry in such books of accounts-from the end of the Financial Years to which it relates;	Financial Statements at the place of registered office and relevant documents at respective plant or office locations.	Chief Financial Officer or any other person authorised by the Board for the purpose.	Section 128 of the Companies Act, 2013 and Rules 3 and 4 of the Companies (Accounts) Rules, 2014	8 Financial Years
13.	Register of Buy back of securities (SH-10)	Registered Office	Company Secretary or any person authorised by the Board	Rule 17(12)(b) of the Companies (Share Capital and Debenture) Rules, 2014	8 Financial Years

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14.	Register of deposits, if any from the date of maturity	Registered Office	Company Secretary or any person authorised by the Board	Rule 14 of The Companies (Acceptance of Deposits) Rules, 2014	8 Financial Years
15.	i. Register of payment of dividend and all documents relating to dividend payment of the Company. ii. Documents evidencing transfer of funds to Investor Education and Protection fund (IEPF). iii. Reconciliation files sent by the banker for Paid and Unpaid dividend	Registered Office	Company Secretary or any person authorised by the Board	i. & ii. Section 123 of the Companies Act, 2013 ii. SEBI Circular no SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated 20 th April 2018 The Company shall make such transfers through corporate action and shall preserve copies for its records.	i. 8 financial years from the end of financial year in which the dividend was paid. ii. 8 financial years from the end of financial year in which the unclaimed amount was deposited in IEPF. iii. 8 (eight) years
16.	Register of proxies	Registered Office	Company Secretary or any person authorised by the Board	Section 105 of the Companies Act, 2013 and Rule 19 of The Companies (Management and Administration) Rules, 2014	8 Financial Years

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17.	Register of inspection	Registered Office	Company Secretary or any person authorised by the Board	Companies Act, 2013	8 Financial Years
18.	Documents related to issue of sweat equity shares	Registered Office	Company Secretary or any person authorised by the Board	Section 154 of the Companies Act, 2013 and Rule 14(a) of The Companies (Share Capital and Debenture) Rules, 2014	8 Financial Years
19.	Certificate received from Secretarial Auditors	Registered Office	Company Secretary or any person authorised by the Board	Section 204 of the Companies Act, 2013 and Rule 9 of The Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014	8 Financial Years
20.	Documents to be filed with Registrar of Companies	Registered Office	Company Secretary or any person authorised by the Board	The Companies Act, 2013	8 Financial Years
21.	Any court order/CLB order	Registered Office	Company Secretary or any person authorised by the Board	The Companies Act, 2013	8 Financial Years
22.	Annual Reports	Registered Office	Company Secretary or any person authorised by the Board	The Companies Act, 2013	8 Financial Years
23.	Replies to show cause notices, if any etc.	Registered Office	Company Secretary or any person authorised by the Board	The Companies Act, 2013	8 Financial Years

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Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
24.	Record of issued and cancelled share	Registered Office	Company Secretary or any person authorised by the Board	The Companies Act, 2013	8 Financial Years
25.	Register of transfer of shares	Registered Office	Company Secretary or any person authorised by the Board	Section 56 of the Companies Act, 2013 and Rule 11 of the Companies (Share Capital and Debentures) Rules, 2014	8 Financial Years
26.	Register of transmission of shares	Registered Office	Company Secretary or any person authorised by the Board	Section 56 of the Companies Act, 2013 and Rule 11 of the Companies (Share Capital and Debentures) Rules, 2014	8 Financial Years
27.	Register of Employee Stock Option (SH-6)	Registered Office	Company Secretary or any person authorised by the Board	Rule 12(10)(a) of the Companies (Share Capital and Debenture) Rules, 2014	8 Financial Years
28.	Register/documents related to postal ballot	Registered Office	Company Secretary or any person authorised by the Board	Section 110 of the Companies Act, 2013 and Rule 22 of Companies (Management and Administration) Rules, 2014	8 Financial Years
29.	Annual Plans and Budgets	Registered Office	Chief Financial Officer or any person authorised by the Board	Not applicable	8 Financial Years
30.	Contracts, Agreements, and related correspondence (including and proposal that	Registered Office	Company Secretary or any person authorised by the Board	Not Applicable	Period of Contracts/Agreement

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Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
	resulted in the contract and other supportive documentation) Register/Records required to be maintained under the Act but not expressly mentioned here, shall be maintained for a minimum period of 8 years.				of 8 Financial Years whichever is longer
31	Tape recording(s) or other electronic recording mechanism of the Board/ Committee/ General body meeting conducted through Video Conferencing or Other Audio Visual Means	Registered Office	Company Secretary or any person authorised by the Board	Rule 3(2)(d) of the Companies Meetings of Board and its Powers) Rules, 2014	2 (two) years from the end of financial year in which the meeting was held
32	Books of Accounts & other related papers	Registered office	Company Secretary or any person authorised by the Board	Section 128 (5) of the Companies Act, 2013	8 (eight) financial years or until the assessment/ appeal if any under direct &

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Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
					indirect tax statutes, has been completed.
33	Income tax returns filed under Income Tax Act, 1961 and other Tax records	Place where the books of accounts are kept	Authorised Person	Income Tax Act, 1961 & other applicable laws/Regulations/enactments	8 financial years or until the assessment/appeal if any under Income Tax Act has been completed. (8) Financials years following the completion of the relevant transactions or assessment year for which the records were last used.
34	Returns, records and other documents under Goods and Services Tax/Sales Tax/VAT/Customs and Excise Act	Place where the books of accounts are kept	Authorised Person	Goods and Services Tax/Sales Tax/VAT/Customs and Excise Act	8 financial years or until the assessment/appeal if any under the respective Act has been completed.

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Sl. No.	Document	Place of preservation	Person responsible for custody	Reference of provision	Period
35	Insurance Policies & other related documents/papers	Registered office	Authorised Person		

B) Illustrative list of Documents identified under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and other SEBI Regulations/ Circulars, apart from Documents mentioned in Annexure 1 & Annexure 2 (Part A) above

Sl. No.	Document	Provision	Listing Regulation no.	Period
1	Compliance certificate / Report (for compliance of Reg. 7(2) signed by Compliance officer & Share transfer agent.	within one month of end of each Half year	7(3)	8 Financial Years
2	Statement giving the number of investor complaints /Grievances pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter.	within twenty-one days from the end of each quarter	13(3)	8 Financial Years
3	Quarterly compliance report / Certificate on corporate governance , Compliance Reports if any received from Statutory Auditor/ Secretarial Auditor and/or any statutory authority	within fifteen days from close of the quarter.	27(2)	8 Financial Years
4	Prior intimation to Stock Exchange about the meeting of the board of directors	Within the time prescribed	29	8 Financial Years
5	Disclosures of any material events or information	Within the time prescribed	30	8 Financial Years

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Sl. No.	Document	Provision	Listing Regulation no.	Period
6	Statement showing holding of securities and shareholding pattern separately for each class of securities	on a quarterly basis, within 21 days from the end of each quarter	31	8 Financial Years
7	Statement of deviation(s) or variation(s) in the use of proceeds from the objects stated in the offer document or explanatory statement to the notice for the general meeting, for public issue, rights issue, preferential issue etc.	Within the prescribed time on a quarterly basis	32	8 Financial Years
8	Quarterly and year-to-date standalone/ consolidated financial results	Within the prescribed time on a quarterly basis	33	8 Financial Years
9	As part of financial results for the half year by way of a note a statement of assets and liabilities as at the end of the half-year	along with quarterly Financial Results	33(3)(f)	8 Financial Years
10	Annual report	within twenty-one working days of it being approved and adopted in the annual general meeting	34	8 Financial Years
11	Annual Information Memorandum		35	8 Financial Years
12	a certificate from a practicing company secretary, certifying that all certificates have been issued within thirty days of the date of lodgment for transfer, sub-division, consolidation, renewal, exchange or endorsement of calls/ allotment monies.	within one month of the end of each half of the Financial Year	40(9)	8 Financial Years
13	Intimation of record date		42	8 Financial Years

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Sl. No.	Document	Provision	Listing Regulation no.	Period
14	Details regarding the voting results of general meetings	within forty-eight hours of conclusion of its General Meeting,	44	8 Financial Years
15	Transcripts of post earnings/quarterly calls, whether conducted physically or through digital means	within five working days of the conclusion of such calls	Regulation 9(a) read with regulation. 46(2) (oa) of the Listing Regulations	8 Financial Years
16	Any and all kinds of intimations/submission/filing to Stock Exchanges, viz. Press Release, Investors Presentation, public filings etc.	Within the time prescribed	-	8 Financial Years
17	Structured Digital Database	-	SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2020 notified on 17 th July, 2020.	8 (eight) years after completion of the relevant transactions and in the event of receipt of any information from the SEBI regarding any investigation or enforcement proceedings, the relevant

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Sl. No.	Document	Provision	Listing Regulation no.	Period
				information in the structured digital database shall be preserved till the completion of such proceedings.

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