MOULIN COMMERCIAL LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS

1. Preamble:

The Securities and Exchange Board of India (SEBI) has issued the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (" SEBI LODR").

Regulation 9 of the aforesaid Regulations requires the Board of Directors of the Company to frame a Policy for Preservation of Documents ("Policy") classifying them into two categories:

i. Documents whose preservation shall be permanent in nature; and
ii. Documents to be preserved for not less than eight years.

The documents that are required to be maintained under this Policy are preserved considering their importance, usefulness and information. The Company recognises that all the documents, whether in physical or electronic mode, form an important and integral part of the Company's records. The preservation of documents is important in order to ensure immediate access to the records, its retrieval and authentication.

Accordingly, the Board of Directors of Moulin Commercial Limited ("the Company") has adopted the Policy for Preservation of Documents.

2. Applicability and Modes of Preservation:

This Policy is applicable to all documents maintained in physical and electronic mode by the Company. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything that endangers the content, authenticity, utility or accessibility of the documents.

The documents not specifically covered under this policy shall be preserved and maintained in accordance with the provisions of the respective acts, rules, guidelines and regulations as applicable under which those documents are maintained.

3. Definitions:

a. "Act" means the Companies Act, 2013.

b. "Applicable Law" means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI), Ministry of Corporate Affairs (MCA) , The Institute of Company Secretaries of India (ICSI) and other professional bodies under which the preservation of documents has been prescribed.

c. "Board" means the Board of the Directors of the Company.

d. "Books of Accounts" includes records maintained in respect of –

   i. all sums of money received and expended by the Company and matters in relation to which the receipts 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 of the Act in case the Company belongs to any class of companies specified under that section.

e. "Company" means Moulin Commercial Limited.

f. "Documents" refers to papers, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences, challan or any other record required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form.

g. "Electronic Form" means any electronic device such as servers, computer, laptop, compact disc, floppy disc, pen drive, 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.

h. "Maintenance" means keeping documents, either physically or in Electronic Form.

i. "Preservation" means to keep in good order and to prevent from being altered, damaged or destroyed.

j. "SEBI LODR" means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. Words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

4. Roles & Responsibilities:

The respective Functional/ Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

5. Authenticity:

Where a document is being maintained both in physical form and Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

6. Destruction of Documents:

The documents specified in Annexe A which are not required to be maintained and preserved permanently, may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional/ Departmental Heads. Any deviation will be approved by the Chief Financial Officer.

7. Dissemination of the Policy:

The approved Policy shall be uploaded on the Company's website, https://moulin.co.in/

8. General:

Notwithstanding anything contained in this policy, the Company shall ensure compliance 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.

9. Review of Policy:

This Policy shall be subject to review, if necessary. 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 without any review. Any change/amendments to this Policy shall be approved by the Managing Director and Chief Financial Officer or Board of Directors.

ANNEXURE A

Secretarial

Sr. No.	Record Type	Preservation Period
1.	Memorandum and Articles of Association	Permanent
2.	Certificate of Incorporation	Permanent
3.	Minutes of Board and Committee Meetings	Permanent
4.	Minutes of Shareholders' Meetings	Permanent
5.	Register and Index of Members	Permanent
6.	Resolutions passed by circulation	8 Financial Years
7.	Listing Agreement executed with the stock exchanges	Permanent
8.	Attendance Register – Board and Committee Meetings	8 Financial Years
9.	Register of investments in securities not held in the name of the Company	Permanent
10.	Register of renewed and duplicate certificates	Permanent
11.	Register of contracts in which Directors are interested	Permanent
12.	Register of Directors, Managing Director, Manager and Secretary	Permanent
13.	Register of Directors' Shareholding	Permanent
14.	Register of Inter-corporate loans and investments	Permanent
15.	Register of transfer of shares	Permanent
16.	Register of Transmission of shares	Permanent
17.	Forms filed with Registrar of Companies (ROC)	Permanent
18.	Notice and Agenda of the Board and Committee Meetings	8 Financial Years
19.	Notices pertaining to disclosure of Interest by the Directors	8 Financial Years
20.	Annual Returns	8 Financial Years
21.	Correspondence with shareholders	8 Financial Years
22.	Disclosures under SEBI – Substantial acquisition of shares and Takeovers, Regulations	8 Financial Years
23.	Disclosures under SEBI – Prohibition of Insider Trading Regulations	8 Financial Years
24.	Postal Ballot forms	8 Financial Years
25.	Scrutinizer's Reports on voting at General Meetings/ Postal Ballot	8 Financial Years
26.	Newspaper cuttings of notices of Board Meeting and Financial Results	8 Financial Years
27.	Investor meet presentations	8 Financial Years

Accounts and Finance Records

Sr. No.	Record Type	Preservation Period
1.	Annual Audited and Financial Statements	Permanent
2.	Books of Accounts, Ledgers & Vouchers	8 Financial Years
3.	Investment Records	8 Financial Years from the date of Redemption
4.	Engagement letters from Auditors	8 Financial Years

Tax Records

Sr. No.	Record Type	Preservation Period
1.	Excise Returns, Income Tax Returns, Sales Tax/ VAT Returns, Service Tax Return, GST	8 Financial Years
2.	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax/ VAT, Service tax, GST	8 Financial Years

Legal

Sr. No.	Record Type	Preservation Period
1.	Original Property Purchase and Sale Agreement	Permanent
2.	Property Card, Ownership records issued by Government Authority	Permanent
3.	Court Orders	Permanent
4.	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts