

Policy for Preservation of Documents of Ironwood Education Limited

Ironwood Education Limited
CIN : L65910MH1983PLC030838
Regd office : KHIL House, 1st Floor,
70C Nehru Road, Adjacent Domestic Airport,
Vile Parle (East), Mumbai - 400099
Tel No. : 022-26631834
Email : cs@ironwoodworld.com
Website : www.ironwoodworld.com

1. LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements Regulations, 2015 (“Listing Regulations”)) require every Listed Company to formulate a Policy for Preservation of Documents.

In this context, the Board of Directors of Ironwood Education Limited (“the Company”) has formulated a “Policy for Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations with the objective of classifying various documents, records and registers for the purpose of maintenance and preservation.

This Policy is effective from 1st December, 2015.

2. DEFINITIONS

- a. Board of Directors or Board shall mean the Board of Directors of Ironwood Education Limited, as constituted from time to time.
- b. Company shall mean “Ironwood Education Limited”.
- c. Documents shall mean all papers, notes, agreements, notices, advertisements, files, forms, correspondence, minutes, registers, books and/or any other records required to be maintained on paper or in electronic form under any law or regulation for the time being in force.
- d. Electronic Form means on any electronic device such as computer, laptop, compact disc, floppy disc, 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.
- e. Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure requirements) Regulations, 2015 (“Listing Regulations”).

3. OBJECTIVES

The objective of this policy is to classify the documents, records and registers of the Company which are required :

- (i) to be preserved permanently and
- (ii) to be preserved for a period of not less than 8 years

4. MAINTENANCE OF DOCUMENTS :

Documents required to be maintained permanently :

- a. Memorandum and Articles of Association of the Company
- b. Minutes of Board Meeting, General Meeting and various Committee Meeting
- c. Statutory Registers required under applicable laws
- d. Intellectual Property Documents
- e. Material Agreements/Contracts
- f. Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Documents required to be maintained at least for eight financial years :

- a. Books of Accounts
- b. Annual Returns
- c. Correspondences with Departments/Shareholders
- d. Insurance Policies/Claims under various policies
- e. Personnel Documents
- f. Relevant Marketing and Sales Documents
- g. Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

5. ROLES AND RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

6. GENERAL

The Company shall preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and rules made thereunder, the Secretarial Standards, the Listing Regulations and any other laws, rules, regulations as may be applicable to the Company from time to time.

7. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both physical and electronic documents.

8. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with the new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

A copy of this policy shall be posted on website of the Company.

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