

Policy For Preservation Of Documents And Archival Policy

[Framed under Regulation 9 and 30(8) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015]

1. Legal Framework

The Securities and Exchange Board of India (SEBI), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Regulations). The Regulations came into force from December 1, 2015. In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, **Mideast Portfolio Management Ltd**, (the Company) is required to formulate a policy for preservation of documents and in terms of Regulation 30(8) of the Listing Regulations; the Company is required to formulate an archival policy.

2. Definitions

“**Board**” shall mean the Board of Directors of Mideast Portfolio Management Ltd.

“**Company**” shall mean “Mideast Portfolio Management Ltd”.

“**Documents**” shall mean all papers, records, files, books, etc., and the like as required to be maintained under any law or regulation for the time being in force.

“**Listing Regulations**” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

3. Objective

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in at least two following categories as follows:

- Documents whose preservation shall be permanent in nature as given in **Annexure 1** attached to this Policy.
- Documents with preservation period of not less than eight (8) years after completion of the relevant transactions as given in **Annexure 2** attached to this Policy.

Provided that the Company may keep the documents as specified above 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 has 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 applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time.

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

4. Archival Policy

In accordance with the provisions of the aforesaid Regulation, the Company shall ensure that all the information shall be hosted on the Company's Website (www.mideastportfolio.com) for a period of 5 years and thereafter 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.

5. Roles & 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

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.

7. Destruction Of Documents

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). 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 a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

9. Communication And Dissemination Of The Policy

Copy of this policy circulated among all the Director of the Company and communicated the existence and contents of this policy to the employees. The new employees shall be informed about the policy.

This policy as amended from time to time shall be made available at the Web site of the Company.

Encl: Annexures

Annexure 1

Documents whose preservation shall be permanent in nature

S.No	Nature of Document (s)
1.	Registration Certificates
2.	Licenses & Statutory Approvals
3.	Statutory Registers required under applicable laws
4.	Audited financial statements
5.	Minutes of General Meeting
6.	Minutes of Board Meeting
7.	Minutes of various Committee Meetings
8.	Material Agreements/Contracts
9.	Orders issued by Courts/Statutory bodies
10.	Any other document as may be required to maintain permanently in terms of applicable law(s)

Annexure 2

Documents with preservation period of not less than eight (8) years after completion of the relevant transactions

S.No	Nature of Document (s)
1.	Books of Accounts
2.	Annual Return(s)
3.	Personnel Documents
4.	Insurance Policies/ Claims under various policies
5.	Correspondences with Departments/shareholders
6.	Non-Statutory Registers/Documents
7.	All Emails received from Internal and External Sources related to business issues
8.	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time
