

PACE AUTOMATION LIMITED

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CIN: L29141TN1989PLC018133

POLICY ON PRESERVATION OF DOCUMENTS & ARCHIVAL

PREAMBLE

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), Pace Automation Limited, ("the company") is required to formulate a policy for "Preservation of Documents".

In terms of Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), Pace Automation Limited, ("the Company") is required to formulate an archival for all disclosures of events / information to the Stock Exchanges in terms of the Company's Policy for Disclosure of Events / Information and Determining Materiality.

The Board of Directors of Pace Automation Limited is -to comply with the requirements of Regulation 9 of the Listing Regulations.

EFFECTIVE DATE - This Policy will be effective 1st March 2016.

2. DEFINITIONS

A. "Board of Directors" or "Board" - Board of Directors or Board shall mean the Board of Directors of New Delhi Television Limited, as constituted from time to time.

B. "Company" - Company shall mean Pace Automation Limited

C. .

D. "Documents" - Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc and the like as required to be maintained under any law or regulation for the time being in force.

E. "Listing Regulations" - 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 establish framework needed for effective preservation of documents and records of the Company, required to be maintained in terms Of the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and also to archive any of the material of events or information which are disclosed by the Company to the Stock Exchanges prior to the period of five years in terms of Regulation 30.

4. POLICY FOR PRESERVATION OF DOCUMENTS

Documents and Records of the Company required to be maintained under the Listing Regulations shall be broadly classified in the following two categories:

- A. The documents of a permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

Provided further that the Company may keep the documents as specified above in an electronic mode.

- B. The documents to be maintained and preserved for a specified time period after" completion of the relevant transactions (listed in Annexure-2) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

- C. 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.
- D. The Registrar and Share Transfer Agent of the Company shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained by them and provide an annual undertaking to the Company in this regard.

- E. 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.
- F. 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). However the list of documents which are destroyed must be duly signed by the Company Secretary and any Of the Directors / CFO. 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.

S. ARCHIVAL POLICY

Any disclosure of events or information which have been submitted by the Company to the Stock Exchanges under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 3 years.

Annexure 1

Documents whose preservation shall be permanent in nature

- I. Registration Certificates
- II. Licenses & Statutory Approvals
- III. Statutory Registers required under applicable laws
- IV. Audited financial statements
- V. Minutes of General Meeting
- VI. Minutes of Board Meeting
- VII. Minutes of various Committee Meetings
- VIII. Material Agreements/Contracts
- IX. Orders issued by Courts/Statutory bodies
- X. Investment Documents/proofs including certificates etc.
- XI. Any Other document as may be required to maintain permanently in terms of applicable law(s), maintained and- preserved from time to time.

Annexure 2

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

- I. Books of Accounts
- II. Annual Return(s)
- III. Personnel Documents
- IV. Insurance Policies/ Claims under various policies
- V. Correspondences with Departments/shareholders
- VI. Non statutory Registers/Documents
- VII Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.