

LANDMARK GLOBAL LEARNING LIMITED

(Formerly known as Landmark Immigration Consultants Limited)

CIN NO.: L74140CH2010PLC032494

**Regd. Office: SCO-95 97 2nd Floor, Sector 17 D,
Chandigarh, Chandigarh G.P.O., Chandigarh, Chandigarh,
Chandigarh, India, 160017**

Tel.: 0172 5006644

Email: info@landmarkimmigration.com

POLICY ON PRESERVATION OF THE DOCUMENTS

Adopted on – 24th January, 2025

CONTENTS

- 1) **PREMBLE**
- 2) **SCOPE**
- 3) **OBJECTIVE OF THE POLICY**
- 4) **EFFECTIVE DATE**
- 5) **DEFINITIONS**
- 6) **GUIDELINES**
- 7) **MODES OF PRESERVATION**
- 8) **DESTRUCTION OF DOCUMENTS**
- 9) **AMENDMENTS**
- 10) **POLICY REVIEW**
- 11) **INTERPRETATION**
- 12) **ANNEXURE A**
- 13) **ANNEXURE B**

POLICY ON PRESERVATION OF DOCUMENTS

1. PREMBLE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Regulations"] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

2. SCOPE

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements.

3. OBJECTIVE OF THE POLICY

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or which are of no value are discarded after following due process for the same.

The major objectives of the policy are:

- a) To identify statutory records to be preserved.
- b) To identify records to be maintained either for a period of eight years or permanently.
- c) To decide the mode of preserving the documents, whether in physical form or in electronic form.
- d) To decide the procedure to destroy the documents after eight years or other applicable period
- e) To help employees understanding their obligations in retaining and preserving the documents and records

4. EFFECTIVE DATE

The Company's Board of Directors has approved this Policy on 24th January, 2025 and this Policy shall take immediate effect from the date of this meeting.

5. DEFINITIONS:

- a) **"Act"** means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.
- b) **"Board of Directors" or "Board"** means the collective body of the Directors of the Company.
- c) **"Current"** means running matter or whatever is at present in course of passage.
- d) **"Electronic Form"** means any contemporaneous 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) **"Maintenance"** means keeping documents, either physically or in electronic form
- f) **"Policy" or "This Policy"** means, "Policy on Preservation of Documents".
- g) **"Preservation"** means to keep the documents preventing them from being altered, damaged or destroyed.
- h) **"Register"** means a register maintained under the Companies Act, 2013 or the SEBI Act.
- i) **"Regulations"** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto

6. GUIDELINES:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the 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.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a) Documents that need to be preserved and retained permanently;
- b) Documents that need to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;
- c) Documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company;
- d) In case of any other Document, for such period as may be decided by the Chief Executive Officer/ Managing Director/ Whole-time Director, after the completion of relevant transaction / event, taking a considered view about its relevance.
- e) Where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”. An indicative list of the documents and the time frame of their preservation is provided in Annexure –A

7. MODES OF PRESERVATION:

Documents may be preserved in

- a) Physical form; or
- b) Electronic Form

The official of the Company who is required to preserve the document shall be Authorized Person who is generally expected to observe the compliance of statutory requirements as per applicable law. 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. The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorized Person with preservation, so as to ensure integrity of the Documents and to prohibit unauthorized access.

8. DESTRUCTION OF DOCUMENTS:

The documents of the Company which are no longer required as per the time schedule prescribed in the Annexure A may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under Annexure A. The details of the documents destroyed by the Company shall be

recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at Annexure B. The entries in the register shall be authenticated by the Authorized Person.

9. 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 the 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.

10. POLICY REVIEW:

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the statutory provisions and remains effective. This Policy shall be reviewed periodically and may be amended by the Board, as may be deemed necessary. On any amendment of the Policy, the same will be published on the Company's website.

11. INTERPRETATION:

Any words used in this policy but not defined herein shall have the same meaning ascribed to it in the Companies Act, 2013 or Rules made thereunder, SEBI Act or Rules and Regulations made thereunder, Listing Agreement, Accounting Standards or any other relevant legislation / law applicable to the Company

**JASMEET SINGH BHATIA
MANAGING DIRECTOR**

Annexure A

A. Indicative List A. PERMANENT PRESERVATION:

- i. Immovable property related documents
- ii. Government approval letters, sanction letters, permissions from government authority, Court Orders, Legal Agreements, and any other Statutory and Legal documents.
- iii. Register of loans, Guarantees, security and acquisition made by the Company (Form MBP2)
- iv. Register of Investment (Form MBP 3)
- v. Register of contracts (Form MBP 4)
- vi. Register of charges
- vii. Register of Members (including Foreign Register of Members)
- viii. Minutes of General Meetings
- ix. Minutes of Board and Committee Meetings
- x. Register of renewed and duplicate share certificates
- xi. Memorandum and Articles of Association
- xii. Documents evidencing ownership of intellectual property rights
- xiii. Certificate of incorporation of the Company, Certificate of Registration, licenses, permits, consents, etc. under various statutory laws such as Factories Act, etc.

B. TEMPORARY PRESERVATION UPTO 8 YEARS:

- i. Books of Accounts, Purchase, Sales including vouchers, Sales Purchase invoices and other supporting documents related to Books of Account
- ii. tax records viz. documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal preferred against any claim made by the relevant tax authorities, shall be maintained for a period of 8 (eight) years from end of the relevant assessment year or till the disposal of the appeal against any demand by the highest authority, whichever is later.
- iii. Payroll Records, Employee deduction authorizations, attendance records, employee medical records, leave records and Pension etc
- iv. Corporate Social Responsibility Records
- v. Disclosure from Directors (Form MBP 1 and DIR 8)
- vi. Dividend Register and paid instruments
- vii. Register of Fixed Deposits
- viii. Register of Fixed Deposit Interest and paid instruments
- ix. Instrument creating charge and modification vii. Register of debenture-holders including an index of the names
- x. Foreign register of debenture holders or any other security holders
- xi. Annual Return and copies of all certificates and documents required to be annexed thereto (8 years from filing with Ministry of Corporate Affairs)
- xii. All books and documents relating to the issue of share certificates

- xiii. Returns, disclosures, filings, etc. with regulatory authorities under various enactments- e.g periodical reports/ returns to SEBI, Stock Exchanges, authorities under the laws relating to income-tax, excise and customs, service tax, value added tax, sales tax, etc.
- xiv. Attendance registers, notices, scrutinizer's report, agenda, and other related papers of general meetings, board meetings and various committee meetings;
- xv. Structure Digital Database as per SEBI (Prohibition of Insider Trading) Regulations, 2015 after completion of the relevant transactions and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

C. DOCUMENTS TO BE MAINTAINED ATLEAST FOR 1 YEAR BEYOND THE PERIOD OF THEIR RELEVANCE:

- i. Confidentiality and non-disclosure agreements
- ii. Records relating to employees
- iii. Documents relating to litigation or arbitration
- iv. Commercial contracts
- v. Bonds, undertakings, etc. lodged with the concerned authorities under various laws such as Customs & Central Excise law.
- vi. Any other as required

D. OTHERS:

Other than above specified, documents shall be maintained for the period of their relevance as per the applicable laws or as per the discretion of the concerned Functional Head.

Annexure B

Specimen format of the register of documents disposed-off /
destroyed

PARTICULARS OF DOCUMENT ALONG WITH PROVISION OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON