



Liberty Shoes Ltd.

POLICY FOR PRESERVATION OF DOCUMENTS

1. PREFACE AND OBJECTIVE

Liberty Shoes Ltd. (" the Company") being a listed entity, is obligated to frame a policy for preservation of documents in terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

As per Regulation 9, the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories i.e.

(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. The listed entity may keep such documents in electronic mode.

In accordance with the above Regulation 9, the Company has framed a Policy for Preservation of Documents, 2016 (hereinafter the "Policy"). The Policy is framed in line with the existing provisions of SEBI-LODR. Any future changes in SEBI-LODR will, ipso facto, apply to this Policy. The Policy has been approved by the Board of Directors in its meeting held on 29th May, 2016.

2. EFFECTIVE DATE

The Policy shall be effective from 29th May, 2016.

3. DEFINITIONS

"Document(s)" refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, the time being in or otherwise, maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

"Electronic Record(s)" means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act,2000.

"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.

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

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

4. DOCUMENTS TO BE PRESERVED

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

(i) CATEGORY A – DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

The following documents shall be maintained and preserved permanently by the Company. All modifications, amendments, additions, deletions to the said documents shall also be preserved permanently by the Company.

(a) Annual Reports of the Company

(b) Minutes of the Board Meetings and Board Committees as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India

(c) Minutes of General Meetings (including AGMs) as prescribed by the "Secretarial Standard-2 on General Meetings" issued by the Institute of Company Secretaries of India.

(d) Any other document, certificates, statutory registers that may be required to be preserved permanently in terms of the Companies Act, 2013 and/or SEBI Regulations.

(ii) CATEGORY B – DOCUMENTS TO BE PRESERVED FOR NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTION.

The following documents shall be maintained and preserved for a term not less than eight years after completion of the relevant transactions. All modifications, amendments, additions, deletions to the said documents shall also be preserved for a term not less than eight Years.

(a) Documents/Information furnished to Stock Exchanges including information submitted in compliance of SEBI-LODR, as amended from time to time, shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is furnished.

(b) Documents/Information submitted to Registrar of Companies/Ministry of Corporate Affairs in compliance with the Companies Act, 2013 & Rules there under shall be preserved for a minimum period of eight years from the end of the financial year in which the documents/information is submitted.

(c) Books of Accounts

- (d) Annual Returns (copies of all certificates and documents required to be annexed thereto) as per Companies Act, 2013.
- (e) Office Copies of Notices, Agenda, Notes on Agenda of Board Meetings and Board Committees and other related papers shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- (f) Office Copies of Notices, Scrutinizer's Report and related papers regarding General Meetings (including AGM) shall be preserved for as long as they remain current or for eight financial years, whichever is later and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-2 on General Meetings" issued by the Institute of Company Secretaries of India.
- (g) Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode for eight financial years and may be destroyed thereafter with the approval of the Board of Directors, as prescribed by the "Secretarial Standard-1 on Meetings of Board of Directors" issued by the Institute of Company Secretaries of India.
- (h) Any other document, certificates, statutory registers which may be required to be maintained and preserved for not less than eight years after completion.

5. DISPOSAL AND DESTRUCTION OF RECORDS

After the expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents.

PRESERVATION OF DOCUMENTS

As per the Policy, the Company shall maintain and preserve register and records, books and/or paper, books of accounts etc ("Documents") as follows:

a) Documents to be preserved permanently;

b) Documents to be preserved for eight years; and

c) Documents to be preserved for two years.

a) Documents to be preserved permanently: As required under the provisions of the Act / Rules/ Regulations, the documents which are required to be preserved on permanent basis shall be maintained and preserved by the Company permanently.

b) Documents to be preserved for eight years: As required under the provisions of the Act/ Rules/ Regulations, the documents which are required to be preserved for a period of eight years shall be maintained and preserved by the Company accordingly.

c) Documents to be preserved for two years: In cases of documents for which no period is specified under the Act / Rules / Regulations, such documents shall be maintained by the Company for a period of two financial years from the close of relevant financial year

