



POLICY FOR PRESERVATION OF RECORDS

1. Legal basis for Policy:

As per Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") all listed entities are required to put in place a policy for preservation of documents.

In the endeavor of Company to establish and maintain records and information that meets its business needs, accountability requirements and stakeholder expectations, Company through this Policy, aims to build a framework for ensuring dissemination of relevant, sufficient and reliable information on a timely and regular basis and to deal with the information that have presently lost its relevance.

Both electronic and paper documents that are needed to be disclosed are generally backed by some regulatory requirement and are thus, subject to be handled with due care. Therefore, electronic records must be managed as a part of a comprehensive record keeping program. The Policy has been framed with an objective of maintenance of the Company's historical data and records hosted on the website at one place, in known locations for making it accessible to staff, shareholders of the Company and its prospective investors.

Definitions :

Archive: A collection of historical documents or records providing information accumulated over the course of an organization's lifetime and includes repository where the records are kept.

Archivists: Archivist is a person who on a time to time basis reviews the records and decides upon the requirement of hosting information on the web portal of the Company. The Compliance Officer and Authorized Officials of the Company shall act as Archivists.

Electronic records: Records communicated and maintained by means of electronic equipment.



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Records: A "record" is a database of disclosed information or events in any format or medium that has been created by or for the Company, or received by the Company in connection with the transaction of the organization's affairs and operations.

2. Scope of the Policy & Prevention of records:

- 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.

- 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.

- c) Every kind of information which is material for the business affairs of the Company and has been disclosed to the Stock Exchanges shall be hosted on the website of the Company for the minimum period of **5 (Five) years** from the date of occurrence/ happening of an event or transaction;
- d) The Company's information and disclosures shall remain in public domain at the Archives section on the website of the Company after stipulated period of **5 (Five) years** from the time when the said information and disclosures are being hosted on the Company's website or such other period as specified by the applicable statutes, whichever is higher. Any kind of information which is of significant and enduring value as per the management of the Company shall be made available in the Archives section.
- e) Every kind of information which is mandated to be disclosed on the website as per the provisions of applicable statutes, rules and



regulation shall be hosted on the website of the Company for such time period as specified under the applicable Statutes, rules and regulations;

- f) All agreement (including their annexure, modifications and extensions) entered into by the Company shall be maintained during the validity / extended validity of agreement. After the expiry of term or termination of agreement, agreement shall be preserved for a period of **5 (Five)** years;
- g) The Company may keep the documents as specified above in an electronic mode.

3. Record Appraisal

Determining the value of a record series is known as "appraisal". Appraisal is the process by which archivists determine the administrative, legal, and fiscal value as well as the historical and long-term research value of records. Once the value of a record series has been determined, a realistic retention period can be assigned to it. Appraisal can take place at any point during a record series' life cycle, but is most frequently done when the records become inactive.

In the interest of stakeholders at large and on the basis of appraisal process, the Archivist may opt any of the following strategies:

- a) extend the time period of hosting of the information on the Company's Website; or
- b) dispose of the information if it is of no relevance; or
- c) get it stored in the Archives section for future reference, if it is not relevant to host but have long-term retention value.

This Policy deals with the manner of preservation of the records and disclosures (both electronic and paper documents that are needed to be disclosed and are required to be maintained by some regulatory requirement) as well as information hosted on the website of the Company for making information accessible to the general public for taking well-informed decisions.

4. Appraisal Consideration

Some of the considerations taken into account during the appraisal process include:



- a) administrative and operational need served by the record;
- b) legal and fiscal regulations governing retention;
- c) historical significance;
- d) economic advantage of moving the records from high cost office storage to low cost records storage space or direct disposal;
- e) identification of materiality of records after a stipulated time period and its impact thereon.

5. Destruction of Records

After the expiry of the statutory retention period, the preserved Records may be destroyed in such mode under any instructions approved by the department head(s). Destruction of Records as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Records

6. Register of Records destroyed

The Company shall maintain a register in the form set out in the **Annexure-3** hereto wherein it shall enter brief particulars of the Records destroyed and all entries made therein shall be authenticated by the Secretary or such other persons as may be authorized by the Board for the purpose.

7. Compliance Officer:

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

The Company Secretary of the Company shall be the Compliance Officer of the Company.

8. Authority & Responsibility:

It shall be the responsibility of the Compliance Officer to keep on updating the Archive section on the website from time to time, by placing the records therein. The authority for determining the time within which the records will be moved to the Archive section shall be



decided by the Compliance officer and reported to the Board of Directors of the Company. The records shall be moved to the Archives only after the approval of the Compliance officer.

9. Effective date and Policy Enforcement

The Policy shall be effective from 1st day of December, 2015.

10. Communication and Dissemination of the Policy

For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company.

This Policy will be communicated to all operational employees and other concerned persons of the Company.

11. Review & Amendment

This policy shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments.



Annexure 1:

Documents whose preservation shall be permanent in nature

S. No	Name/ 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	Investment Documents/proofs including certificates etc.
11	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

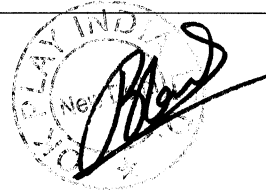
S. No	Name/ Nature of Document(s)
1	Books of Accounts
2	Personnel Documents of employees
3	Insurance Policies/ Claims under various policies
4	Correspondences with Departments/shareholders
5	Non-Statutory Registers/Documents
6	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved



	from time to time.
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Annexure-3

S. No	Nature of Document(s)	Date and mode of destruction	Initials of Secretary or other Departmental Head/ Authorized person
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A circular stamp is located in the lower right quadrant of the page. The stamp contains the text "SECRETARY" at the top and "INDIA" at the bottom. In the center, there is a handwritten signature in black ink that appears to be "M. S. D.".