

OYMPIA CAPITALS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

(Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015)

(Effective from 1st December, 2015)

1. PREAMBLE:

Securities and Exchange Board of India by Notification Dated September 2, 2015 Introduced Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulation, 2015 (Hereinafter called as “**The Regulations**”). It shall come into force on the ninetieth day i.e. December 01, 2015, from the date of their publication in the official Gazette.

Pursuant to Regulation 9 of aforesaid Regulation, every listed Company 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
- b) documents with preservation period of not less than eight years after completion of the relevant transaction.

The Board of Directors (the “Board”) of Olympia Capitals Limited (“the Company”) has adopted Preservation of Documents Policy (“the Policy”), as required under the above Regulations. In any circumstance, where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time as this Policy is changed to conform to the law, rule, regulation or standard.

2. OBJECTIVE:

To facilitate efficient and effective operation of our company, we are implementing this policy. This policy shall cover all business records or Documents of the Company. The Authorized Management of the Company and the Authorized key Managerial Person (KMP) would be responsible for overseeing the implementation of the Policy.

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company’s approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical. A good document preservation program is fundamental to the Company’s commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents. This policy seeks to ensure that the Company’s business is adequately documented that are then managed in accordance with best practice. Preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability.

3. MODES OF PRESERVATION

The Documents may be preserved in

- Physical form or
- Electronic Form.

4. PRESERVATION OF DOCUMENTS

A. Documents which are maintained to be permanently:

The Company shall maintain the following documents on a permanent basis:

1. Shareholding Pattern
2. Quarterly Financial Results
3. Annual Financial Results
4. Annual Report
5. Shareholding Pattern in case of Capital Restructuring.
6. Voting Results by Shareholders
7. Draft Scheme of Arrangement
8. Yearly Disclosure of shareholding of Promoters.

B. Documents which are to be maintained for at least Eight (8) financial years:

The Company shall maintain the following documents for at least Eight (8) financial years:

1. Statement under Grievance Redressal Mechanism
2. Corporate Governance Report
3. Statement of deviation or variation in use of issue proceeds
4. Compliance Certificate to the exchange about the share related activities maintained by RTA registered with SEBI
5. Compliance Certificate w.r.t. Transfer or transmission or transposition of securities with 30 days
6. Listing Fees
7. Intimation of appointment of Share Transfer Agent
8. In-principle approval prior to issue of securities
9. Prior Intimations of Board Meeting for financial Result
10. Prior Intimations of Board Meeting for Buyback, voluntary delisting etc
11. Prior Intimations of Board Meeting for alteration in nature of securities
12. Disclosure of Price Sensitive Information
13. Shareholding Pattern prior to listing of Securities
14. Record date or Date of closure of transfer books
15. Recommend or declare all dividend and/or cash bounces
16. Change in name of listed entity
17. Disclosure of information or events

18. Reconciliation of Share Capital Audit Report

5. DISPOSAL AND DESTRUCTION OF DOCUMENTS

The records or documents preserved shall be reviewed every year or according to need by the respective department and action taken to destroy those records which are due for disposal under the instructions approved by the board of Directors/ concerned Functional Director / Head of the Department .

This applies to both physical and electronic Documents.

6. AMENDMENTS TO THE POLICY

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.
