

POLICY FOR PRESERVATION OF DOCUMENT

1. PREFACE:

The Board of Directors (the “Board”) of Hawa Engineers Limited (the “Company”) has adopted the following policy with regard to preservation of documents. This Policy has been formulated in accordance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 (“the Listing Regulations”). This Policy shall be known as “Policy for Maintenance and Preservation of Documents”.

2. OBJECTIVE OF THE POLICY AND SCOPE

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately preserved, protected and if required, destroyed as per the statutory requirements after following the due process. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

For the purpose of these instructions, Document shall include all information in whatever form it may be stored e.g. hard copies, electronic documents, computer disc, mails, etc.

All the Words and expressions used in this Policy, unless defined hereinafter, shall have meaning respectively assigned to them under the SEBI’s LODR, 2015 and in the absence of its definition or explanation therein, as per the Companies Act, 2013 and the Rules, Notifications and Circulars made/issued thereunder, as amended from time to time.

3. ADMINISTRATION

The Documents of the Company shall be classified into following categories based on period of preservation

- 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;

specified in clauses (a) and (b) above may be kept in electronic mode.

Schedule A is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The list of Documents is indicative list and shall not be construed to be exclusive. Company Secretary cum Compliance Officer of the Company (“CS”) shall be in charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator under the supervision / guidance of the Board of Directors is also authorized to make modifications to the Documents

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Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy. Notwithstanding anything contained in this policy, if any document is required to be maintained and preserved under any Act or law for the time being in force, then such document shall be maintained and preserved as per the provisions of the particular Act or law.

4. PROCEDURE FOR DISPOSAL OF DOCUMENTS

The Documents of the Company which are no longer useful may be destroyed as per timeline prescribed in Schedule A with the permission of Administrator and after following the due process as mentioned herein. The Administrator will confirm from respective departmental head about the destruction of the records which are no longer required as per the Documents Preservation Schedule given under Schedule A. Once the Departmental head confirms for destruction of the document, the administrator shall confirm the same from a Committee comprising of Chief Financial officer and Business Unit Heads.

5. POLICY REVIEW AND BOARD'S APPROVAL

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications

ANNEXURE 1 DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

Sr No.	Documents Type	Preservation Period
1.	Common Seal, Certificate of Incorporation, Memorandum and Article of Association as amended from time to time, Share Certificate	Permanent
2.	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
3.	Statutory Registers	Permanent
	Register of Members along with Index of Members (if any)	Permanent
	Register of Inter Corporate Loans and Investments	Permanent
	Register of Directors, Key Managerial Personnel and their holding	Permanent
	Register of contracts or arrangements with related parties and contracts and bodies, etc. in which directors are interested	Permanent
	Register of Loan, Guarantee, Security and Acquisition	Permanent
	Register of Investments (for Investments of Company)	Permanent

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	held or not held in its own name)	
	Register of Proxies	Permanent
	Attendance Register	Permanent
	Register of Renewed and Duplicate Share Certificates issued	Permanent
	Register of Charges	Permanent
	Register of Employee Stock Options	Permanent
	Register of Sweat Equity Shares	Permanent
	Register of Buy Back of Securities	Permanent
	Foreign Register of Members	Permanent

ANNEXURE 2

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN 8 (EIGHT) YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS

Sr No.	Documents Type	Preservation Period
1.	Annual Returns prepared under the Companies Act, 2013 and copies of all certificates and documents required to be annexure thereto (as per Companies Act, 2013 and Rules framed thereunder)	8 Years
2.	Copies of Notices, Agenda, Notes on Agenda, Attendance Registers and other related papers of General Meetings, Board Meetings and various Committee Meetings	8 Years
3.	Books of Account together with vouchers relevant to any entry in such books of account	8 Years
4	Instrument creating a charge or modification thereof (as per Companies Act, 2013 and Rules framed thereunder)	8 Years
5	Register of Debenture-holders (if require)	15 years after the redemption of debentures
6	Index of debenture-holders (if require)	15 years after the redemption of debentures
7	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.	As per requirement

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