



TRINITY TRADELINK LIMITED

(Formerly Omnitech Petroleum Limited)

CIN NO. L11103MH1985PLC035826

Regd. Office: #16 & 17, Washington Plaza, Dispensary Road,
Goregaon (W), Mumbai- 400 062, Website: www.trinitytrade.in

Email id: - info@trinitytrade.in, Phone No. 022 2873 0274, Fax No. 022 2873 0275

POLICY FOR PRESERVATION OF DOCUMENTS

(Pursuant to clause 9 of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015)

LEGAL FRAMEWORK

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (Hereinafter called as "The Regulations") every listed Company shall frame a policy on preservation of documents. This policy *inter alia* provides for preservation of documents where such preservation shall be of permanent nature as also documents with preservation period of not less than eight years after completion of the relevant transactions to which such document relates.

OBJECTIVE

The purpose of this policy is to preserve the prescribed documents:

- Permanently, or
- For the period statutorily required or for eight years, whichever is higher.

SCOPE

A policy on preservation of Documents (defined below) would ensure safe keeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, on preservation of employees in handling the documents efficiently. It not only covers the various aspects on the preservation of the Documents, but also the safe disposal/destruction of the documents.

DEFINITIONS

- a) Act: "Act" means the Companies Act, 2013 including any amendment or modification thereof.
- b) Board: Board means Board of Directors of the Company.
- c) Company: "Company" means Trinity Tradelink Limited.
- d) Compliance Officer: "Compliance Officer" means the Company Secretary of the Company who is responsible to perform duties as required under section 205 of the Companies Act 2013 and Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.





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- e) Director: "Director" means a person as defined in Section 2(34) of the Companies Act, 2013 and presently appointed as a Director in the Company.
- f) Document: "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- g) Employees: "Employees" shall mean the employees and office-bearers of the Company, including but not limited to Whole Time Directors.
- h) Regulations: "Regulations" shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
- i) Secretarial Standards: "Secretarial Standards" means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.
- j) Stock Exchange or Exchanges: "Stock Exchange or Exchanges" shall mean BSE Limited and National Stock Exchange of India Limited
- k) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

CLASSIFICATION OF DOCUMENTS

1. Documents shall be classified in the following categories
 - a. Mandatory under governing laws
 - b. Non-Mandatory
2. Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.
3. All records and documents as provided herein shall be preserved for such time and period as may be provided herein.
4. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.





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PRESERVATION OF DOCUMENTS

The retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors as the overseeing authorities deem fit.

a. Tax & Accounting Records: Tax records include, but may not be limited to, documents concerning Tax exemption and related documents, payment challans, Tax Deducted at Source records, Value Added Tax records, income tax records, sales tax records, and other documents concerning the Company's revenues and expenses including capital expenditure. Tax records should be retained for at least eight years from the date of filing the applicable return or such period of time as prescribed under Tax laws whichever is later.

b. Employment Records/Personnel Records: The Company requires to maintain certain recruitment, employment and personnel information. The Company should also maintain personnel files that reflect performance reviews if any and any complaints brought against the Company or individual employees. The Company should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file.

- Employment and personnel records shall be preserved for a minimum period of eight years irrespective of whether such employee continues to be employed with the Company or not.

- Individual employee files need to be maintained as long as the concerned individual remains an employee of the Company as also for a minimum period of 5 years thereafter or such period of time as prescribed under respective laws for time being in force whichever is later.

c. Secretarial Documents: The Company should retain the copies of Memorandum & Articles of Association of the Companies, Affidavit from the Subscribers to the memorandum and from persons named as the first directors, Register of members, financial statements, books and documents relating to the issue of share certificates, minutes books of General Meeting along with statutory registers, and other documents as prescribed under governing laws shall be preserved permanently. The documents which the Company is required to preserve for a minimum period of eight years are annual return, attendance registers of Board and General Meetings, various forms, Notice of Board Meeting and related papers, Notices, Agendas, Notes on Agenda and other related papers of Board Meetings and Committee Meetings and others as prescribed under governing laws. The various disclosures which has been made to Securities Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 be the Company shall be preserved for a minimum period of five years.





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d. Press Releases/Public Filings. The Company should retain copies of all press releases and documents filed with Stock Exchanges, Registrar of Companies and other regulatory authorities on a permanent basis.

e. Legal Files / documents: All legal documents / copies of notices / summons / orders / judgments and all other legal documents shall be preserved permanently. Documents like leases, Leave & License agreements and other agreements shall be preserved for atleast 5 years beyond the life of the said documents.

f. Contracts: Final, execution copies of all contracts entered into by the Company should be retained. The Company should retain copies of the final contracts for at least five years beyond the life of the agreement, and longer in the case of publicly filed contracts.

g. Electronic Mail: All E-mails from internal and external sources that are important and have significant impact and lasting consequences are entitled to preserve permanently.

REVIEW & APPROVAL

The policy shall be reviewed as and when deemed necessary by the Board of Directors. This policy is approved in the meeting of the Board of Director of the Company held on 14th day of November, 2015.

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.

EFFECTIVE DATE

This policy shall be effective from 1st December, 2015 until withdrawn by the Board by way of Resolution.

