

POLICY FOR THE PRESERVATION OF DOCUMENTS

Regulation 9 of SEBI (Listing Obligations and Disclosures Requirements), Regulations, 2015

VIRTUAL GLOBAL EDUCATION LIMITED

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Under Regulation 9 of SEBI (Listing Obligations and Disclosures Requirements), Regulations, 2015

1. PREAMBLE:

The Board of Directors (Board) of Virtual Global Education Limited (the Company) has adopted the following policy and procedure with regard to preservation of documents as defined below. The Board will review and may amend this policy from time to time.

2. PURPOSE:

This policy is framed as per requirement of Regulation 9 of SEBI (Listing Obligations and Disclosures Requirements Regulation, 2015.

The policy contains the guidelines how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of if no longer required.

3. DEFINITIONS:

“Act” means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;

“Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereto;

“Company”, “The Company”, shall mean “**VIRTUAL GLOBAL EDUCATION LIMITED**”.

“Board of Director” or “Board”, means the collective body of the Directors of the Company.

“Policy” or “This Policy” means, “Policy on preservation of Documents.”

“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.

“Compliance Officer” the Company Secretary and/or a Key Managerial Person appointed by the Board of Directors of the Company as the Compliance Officer for the purpose of these regulations from time to time.

4. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

The Board of Directors shall decide necessity of preservation of documents permanently from time to time as required under the Act and Regulation.

- I. Documents/ Records related to accounts, secretarial department:
The following documents shall be preserved permanently by the Company:-
 - a. Annual Reports of the Company
 - b. Minutes of all the General Meetings
 - c. Disclosure made under the SEBI Insider and Takeover Regulations and the SEBI (LODR) Regulations, 2015 to the Stock Exchange from time to time.
 - d. Memorandum and Articles of Association of the Company as may be amended from time to time.
 - e. Letter of offer related to public issue, right issue, further issue, buyback offer, etc. (if any)
 - f. Scrutinizers` Reports
 - g. Register of Members
 - h. Statutory Forms and disclosures except for routine compliance
 - i. Common Seal
 - j. Any others, if Board of Director may deem fit.

5. DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS COMPLETION OF THE RELEVANT TRANSACTION:

- a. Notice of the Board Meetings given to the Stock Exchange for considering matters relating to pre- intimations required to be submitted to the Stock Exchange.
- b. Date for the Book Closures and Record dates for various purposes as may be decided by the Company from time to time.
- c. Quarterly and half yearly and annual financial results of the Company.
- d. Quarterly Shareholding Pattern
- e. Results of the E-voting, General Meetings, Postal ballot etc.
- f. Change in the Constitution of the Board of Directors, KMP, Compliance Officer, Auditors, Secretarial Auditors, Share Transfer Agent.
- g. Agreement with the Share Transfer Agent, Depositories

- h. Any Price sensitive information given or provided to the Stock Exchange under Regulation 30 of the SEBI (LODR) Regulations, 2015.
- i. Recommendation and payment of dividend to the Shareholders, if any.
- j. Details of the Complaints received and resolved by the Company.
- k. Copy of the orders issues by the SEBI or Stock Exchanges relating to Securities Listed with the Stock Exchanges.

The above said documents shall be hosted by the Company on its website for a period at least 8 years. The Board of Directors may decide the preservation period for any particular documents.

6. RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS:

The Company Secretary and in absence thereof the Key Managerial Personal appointed by the Board of Directors of the Company are responsible for taking into account the potential impacts on preservation of the documents and their decision to retain/ preserve or destroy documents.

7. AUTHORISED FOR MONITORING THE POLICY:

The Company Secretary or any Key Managerial Personal of the Company authorised by Board of Directors shall be responsible for monitoring the Policy. The authorised person shall inform its Board of Directors about the monitoring of the Policy.

8. PRESERVATION PRINCIPLES:

It is only through preservation that continued availability and access to items in the collections can be maintained. The following principles shall be kept in mind:-

- Where possible, documents are preserved in their original format.
- Appropriate conservation measures will take into accounts the needs, value, significance and usage.
- All staff is made aware of the paramount importance of preservation and are trained on safe handling of documents.

9. SECURITY OF DOCUMENTS:

The Board shall ensure that all the documents shall keep in safe place in the Company premises. The Board may authorize person for the security of documents, who shall be responsible for safe custody of documents.

10. REVIEW OF THE POLICY

The Board of Directors of the Company shall review the policy time to time. The authorised person shall provide regular assurance to board of Directors on the effectiveness of the Policy.