

ATTACHMENTS

Policy on Disclosure of Material Events

AS PER REGULATION 30

OF

The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

(1) Mohit Paper Mills Limited shall make disclosures of any events or information which, in the opinion of the board of directors of the listed company, is material.

(2) Events specified in Para A of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 are deemed to be material events and Mohit Paper Mills Limited shall make disclosure of such events.

(3) Mohit Paper Mills Limited shall make disclosure of events specified in Para B of Part A of Schedule III, based on application of the guidelines for materiality, as specified in sub-regulation (4).

(4) (i) Mohit Paper Mills Limited shall consider the following criteria for determination of materiality of events/ information: (a) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly; or (b) the omission of an event or information is likely to result in significant market reaction if the said omission came to light at a later date; (c) In case where the criteria specified in sub-clauses (a) and (b) are not applicable, an event/information may be treated as being material if in the opinion of the board of directors of listed entity, the event / information is considered material.

The following Persons have been authorized for the purpose of determining materiality of an event or information.

Name	Address	Contact details	Designation
Sandeep Jain	15A/13, Upper Ground Floor, east Patel Nagar, New Delhi-110008	9837067240	Managing Director/CEO
Anant Vats	Begum Bagh, Meerut	9927866766	C.S.
Arvind Kumar Dixit	9KM Stone, Nagina Road, Bijnor-246701	975661342	C.F.O.



MOHIT PAPER MILLS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), Mohit Paper Mills Limited has adopted this Policy effective from December 01, 2015. 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.

The preservation of Documents shall be done in the following manner:

Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.

Authority for maintaining , preserving and destroying the Documents

Departmental Head concerned will be responsible for the maintenance, preservation, and destruction of records pertaining to the respective Department. **Mode of Preservation**

- a. Physical
- b. Electronic

Head of the Department should consider the following while maintaining and preserving the records:

- (a) Books of Accounts and Vouchers and other related papers/documents should be kept for 8 years.
- (b) Tax Records: Tax records may be retained for at least Eight years from the date of filing the applicable return.
- (c) Employment Records/Personnel Record: Several Central & State statutes require the Company to keep certain recruitment, employment and personnel information. . Employment and personnel records should be retained for five years or as per the applicable Act/Law.
- (d) Minutes of the Board and its committees should be maintained permanently. Register and Index of Members should be preserved permanently. Annual Returns and Documents should be preserved for 8 years.
- (e) Legal Files: Legal documents should generally be maintained for a period of eight years or till the completion of the case, whichever is later.
- (f) Excise Records: Excise Records shall be maintained and preserved for 5 years or as per the applicable Act/Law.

Notwithstanding anything contained in this Policy, the Company shall ensure to comply with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.



**RELATED PARTY TRANSACTION POLICY
OF
MOHIT PAPER MILLS LIMITED**

I. INTRODUCTION

This policy regarding the review and approval of Related Party Transactions of Mohit Paper Mills Limited has been adopted by the Company in order to set forth the procedure under which transactions with Related Parties must be approved.

II. DEFINITIONS

For the purpose of this Policy, the following definitions apply:

- a. Board means the Board of directors of Mohit Paper Mills Limited;
- b. Company means Mohit Paper Mills Limited;
- c. Material Related Party Transaction means a transaction with a related party if the transaction/transactions to be entered into individually or taken together with previous transactions during a financial year, exceeds ten percent of the annual consolidated turnover of the Company as per the latest audited financial statements of the Company;
- d. Policy means this Policy on Related Party Transactions;
- e. Related Party means the following:
an entity shall be considered as related to the Company if:
-such entity is a related party under section 2(76) of the Companies Act, 2013.
- f. Relative means as defined under section 2(77) of the Companies Act, 2013 read with its rules.

Related Party Transaction means a transaction as envisaged as a related party transaction under the Companies Act, 2013

Arms Length transaction means a transaction between two related parties that is conducted as if they are unrelated, so that there is no conflict of interest.

III. PROCESS AND PROCEDURE AND REVIEW FOR DEALING WITH RELATED PARTY TRANSACTIONS

1. Prior approval of audit committee is required to be taken for entering into transactions with a Related Party.
2. The audit committee may grant omnibus approval for Related Party transactions as proposed to be entered into by the Company subject to the conditions mentioned in regulation 23 of SEBI (LODR) Regulations, 2015 (as amended from time to time)
3. Prior approval of the Board of directors and shareholders is required to be taken before entering into related party transactions which are not in the ordinary course of business and not on an arm's basis and are beyond the limits as specified under Companies Act, 2013 and rules thereto.

4. Where any director is interested in any contract or arrangement with the related party, such director shall not be present at the meeting during discussions on the subject matter of the resolution relating to such contract or arrangement.

5. Prior approval of shareholders is required to be taken before entering into Material related party transaction irrespective whether the transaction is in ordinary course of business or not and related parties shall abstain from voting on such resolution.

6. All existing material related party contracts or arrangements entered into prior to the date of notification of these regulations and which may continue beyond such date shall be placed for approval of the shareholders in the first General Meeting subsequent to notification of these regulations.

The Company reserves the right to amend or modify this policy in whole or in part, at any point of time.



POLICY ON MATERIAL SUBSIDIARY

OF

MOHIT PAPER MILLS LIMITED

DEFINITIONS

Listed Entity means "MOHIT PAPER MILLS LIMITED"

Holding Company means as per section 2(46) of the Companies Act, 2013

Subsidiary Company means as per section 2(87) of the Companies Act, 2013

Material Subsidiary means shall mean a subsidiary, whose income or net worth exceeds twenty percent of the consolidated income or net worth respectively, of the listed entity and its subsidiaries in the immediately preceding accounting year.

OBLIGATION WITH RESPECT TO SUBSIDIARY COMPANY

- (1) At least one independent director on the board of directors of the listed entity shall be a director on the board of directors of an unlisted material subsidiary, incorporated in India.
- (2) The audit committee of the listed entity shall also review the financial statements, in particular, the investments made by the unlisted subsidiary.
- (3) The minutes of the meetings of the board of directors of the unlisted subsidiary shall be placed at the meeting of the board of directors of the listed entity.
- (4) The management of the unlisted subsidiary shall periodically bring to the notice of the board of directors of the listed entity, a statement of all significant transactions and arrangements entered into by the unlisted subsidiary. Explanation.- For the purpose of this regulation, the term "significant transaction or arrangement" shall mean any individual transaction or arrangement that exceeds or is likely to exceed ten percent of the total revenues or total expenses or total assets or total liabilities, as the case may be, of the unlisted material subsidiary for the immediately preceding accounting year.
- (5) A listed entity shall not dispose of shares in its material subsidiary resulting in reduction of its shareholding (either on its own or together with other subsidiaries) to less than fifty percent or cease the exercise of control over the subsidiary without passing a special resolution in its General Meeting except in cases where such divestment is made under a scheme of arrangement duly approved by a Court/Tribunal.
- (6) Selling, disposing and leasing of assets amounting to more than twenty percent of the assets of the material subsidiary on an aggregate basis during a financial year shall require prior approval of shareholders by way of special resolution, unless the sale/disposal/lease is made under a scheme of arrangement duly approved by a Court/Tribunal.

The Company reserves the right to amend or modify this Policy in whole or in part, at any point of time.

