

Policy on Preservation of Documents and archival of documents in its website

1. Purpose and Scope

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain guidelines on 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 needed.

This Policy will be applicable with effect from December 1, 2015 in terms of Clause 9 of Chapter III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

2. Statutory Mandate

The policy on preservation of documents and archival is mandated by the provisions of regulation 9 of Chapter III of LODR, 2015.

3. Classification of Documents to be preserved / retained

Based on the recommendation of the management of the Company, the Board of Directors have classified the following documents to be retained and preserved for posterity.

- ❖ Documents that need to be preserved / retained permanently – **Type A**
- ❖ Documents that may be preserved / retained for a period of 8 years or more as specified under the Companies Act, 2013 or LODR or other Statutes– **Type B**
- ❖ Documents to be preserved electronically and archived when necessary – **Type C.**
- ❖ Documents that may be retained for less than 8 years – **Type D.**

4. Principle of Responsibility of Employees for Preservation of Documents

All employees of the Company are responsible for preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

5. Periodical Review of the Policy by Top Management

The policy should be reviewed periodically by the Top Management and make amendments if required, subject to approval of the Board. The Top management may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time.

6. **Administration**

The Record Retention Schedule approved by the Board of Directors for initial maintenance, retention and disposal schedule for physical records is as given in the annexure.

7. **Suspension of Record Disposal in the event of Litigation or Claims**

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management determine otherwise. .

8. This policy was approved by the Board of Directors on December 2, 2015.

Type of Record

1. Accounting and Finance records including Annual Financial statement
2. Insurance Records
3. Tax records
4. Contracts entered into by the Company
5. Corporate Records including Certificate of Incorporation and other approvals from other statutory authorities.
6. Legal Records
7. Property Records
8. HR and Payroll Records
9. Corporate Social Responsibility Records
10. Electronic Documents including email retention and back up

1. Accounting and Finance records including Annual Financial statement

Record Type	Retention Period	Document Type
Annual Audit Reports and Financial Statements	8 Years	Type B
Accounting Vouchers and supporting bills	8 Years	Type B
Bank Statement and Cancelled Cheques	8 years	Type B
Books of Accounts	8 Years	Type B
Investment Records	8 Years	Type B

2. Insurance Records

Record Type	Retention Period	Document Type
Insurance Policies for the Company	8 years from the expiry of policy term	Type B

3. Tax records

Record Type	Retention Period	Document Type
Income Tax Returns	8 years	Type B
Service Tax Records	8 years	Type B

Responsibility : FINANCE AND ACCOUNTS DEPARTMENT

4. Contracts entered into by the Company

Record Type	Retention Period	Document Type
Contracts entered into by the Company	8 years	Type B

Responsibility : LEGAL DEPARTMENT

5. Corporate Records including Certificate of Incorporation and other approvals from other statutory authorities.

Record Type	Retention Period	Document Type
Corporate Records (certificate of incorporation, commencement of business, Common Seal, minutes book of board and committees thereof, annual reports, etc.)	Permanent	Type A
ROC Filings and Stock Exchange filings in physical /Electronic form	8 years from the date of filing	Type B

Responsibility : SECRETARIAL DEPARTMENT

6. Legal Records

Record Type	Retention Period	Document Type
Litigation files	13 years after expiration of disposal of the case	Type B
Court Orders	Permanent	Type A

Responsibility : LEGAL DEPARTMENT

7. Property Records

Record Type	Retention Period	Document Type
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent	Type A
Original Purchase / Sale Deeds	Permanent	Type A
Original Lease Agreements	3 years after expiration of the lease	Type D

Responsibility : ADMINISTRATION DEPARTMENT

8. HR and Payroll Records

Record Type	Retention Period	Document Type
Payroll Registers	8 Years	Type B

Personnel Files of individual employees	8 years after termination of service of employment	Type B
Group Insurance Plans – Active Employees	5 years from the expiry of policy term	Type D

Responsibility: HUMAN RESOURCES DEPARTMENT

9. Corporate Social Responsibility Records

Record Type	Retention Period	Document Type
Records on CSR Projects	8 Years	Type B

Responsibility : HUMAN RESOURCES DEPARTMENT

10. Electronic Documents including email retention and back up

- Important electronic mail from internal and external sources needs to be retained for a minimum period of 24 months.
- Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employees' workplace.

Document Type : Type C

1. Electronic Documents including PDF files.

- PDF documents – Can be a maximum period of 8 years. But the said document may be destroyed depending upon the completion of the job or its use coming to an end.
- Text/ Formatted files : All word / excel / Power point files may be deleted depending on the importance or lack of it.

Document Type : Type C

2. Web page files

- May be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.

Document Type : Type C

Responsibility : SYSTEMS DEPARTMENT