

POLICY FOR PRESERVATION & ARCHIVAL OF DOCUMENTS

INTRODUCTION

In the day to day operation, the Company is required to make a number of documents, including minutes, reports, registers, books of accounts, papers, contracts, vouchers etc. in connection with the business of the Company. Some of the documents are made as per the statutory requirement others are generated for recording transactions / events of the Company. Some documents are required to be maintained permanently by Law, some of them need to be maintained for a fixed period and others may be destroyed after the completion of the transaction.

Over a period of time, preservation of all documents is a costly affair and retrieval of the required documents is also difficult. Hence, the documents which are not required, need to be destroyed, documents required for a fixed period shall be destroyed after the fixed period. Hence it become essential to have a standard policy for maintenance of documents and records of the Company.

REQUIREMENT

Regulations 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (LODR, 2015) requires that every listed Company shall have a policy for the preservation, maintenance and archival of documents. In compliance of the said Regulations the Company has proposed to adopt the Policy for the **Preservation, Maintenance and Archival of Documents** hereinafter referred to as the “**Policy**”.

OBJECTIVE

The main object of this policy is to establish a suitable framework to maintain the documents and records which are required to be maintained by the Company to record happening of events and quick retrieval of required documents / records whenever required.

POLICY FOR PRESERVATION / MAINTENANCE / DESTRUCTION

- A. Documents and Records of the Company which required to be maintained permanently are:
 - i. Such documents / records which under any Act, Rule / Regulation is required to be kept permanently.
 - ii. Such documents / records which could serve permanently as an evidence of any transaction relating to title for any property - whether movable, immovable or intellectual.
 - iii. Such other documents which in the perception of the management are Permanent.
- B. Documents and Records which need to be preserved and maintained for a specified period of time by virtue of any Act / Rule / Regulation shall be preserved for that specified period.
- C. The documents not covered under A and B above shall be preserved for a period of eight years from the date of such transactions.

- D. The documents / records posted in the Company's website in pursuance of the requirements of LODR, 2015 shall be kept posted for a period of five years, thereafter shall be moved to archives. The website shall provide for the retrieval of the historical data from the archives at least for a period of five years after moving to archives.
- E. Document and records are to be maintained generally in physical form. However, wherever permitted by Law, may be maintained in electronic form- whether in digitized form or in any other form.
- F. The system employed for the preservation of documents whether physical or in electronic mode shall ensure safety, not accessible to third parties, could maintain confidentiality and is easy to retrieve whenever required.
- G. Documents which need to be preserved for a specified period, may be destroyed after a period of two years of completion of the specified period.
- H. For destruction of the documents, the provisions of the relevant Act relating to destruction of records shall be duly complied with before destruction of the documents.
- I. Documents or records preservation / destruction of which is not controlled by any Law for the time being in force, may be destroyed after making a list of documents destroyed and after inspection by a responsible officer of the Company.
- J. Where, the documents / records of the Company are maintained by any external agency like the Registrar and Share Transfer Agents, such agency shall ensure the adoption of this policy for the preservation of the documents of the Company and shall give an annual confirmation to that effect.
- K. All the Statutory Registers / Documents / Books of accounts shall be maintained at the Registered Office of the Company or such other place(s) as may be approved by the Board of Directors.

APPLICABILITY

This policy is applicable for all the documents and records of the Company maintained by all offices, factories, divisions, departments, sections of the Company and shall come in to force on and from the date of approval by the Board of Directors.

AMENDMENT

No change, modification or amendment to this policy is valid unless such change, modification or amendment is approved by the Board of Directors or is required pursuant to change in the applicable law.