

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS

PREAMBLE

The policy on preservation of documents and archival of documents is in accordance with the provisions of the Companies Act, 2013 and Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

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 gives 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 and how the documents should be accessed and retrieved when they are needed.

RESPONSIBILITY

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department.

MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form.

CLASSIFICATION OF DOCUMENTS

The Company’s physical and electronic documents shall be classified for the purpose of preservation as follows:

- A. Documents whose preservation shall be permanent in nature;
- B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions;
- C. Documents whose preservation shall be for a minimum period of three years after completion of the event.

Documents whose preservation shall be permanent in nature:

- 1. Accounting and Finance records including Annual Financial statements and Audit Reports
- 2. Investment records.
- 3. Tax records including annual returns
- 4. Property records including purchase and sale deeds, licences, permissions, copyrights, patents & trademarks.
- 5. Corporate Records including Certificate of Incorporation, Common Seal, Memorandum & Articles of Association, Share certificates, Notices, Minutes of Board, Committee and Shareholders’ Meetings, Scrutinizer Report, listing agreement, trading & listing approval, Register of Members and other Statutory Records.

6. Personal files of individual employees.
7. Policies of the company

8. Any other record as may be decided by the Chief Executive Officer of the Company from time to time.

Documents whose preservation period shall not be less than eight years after completion of the relevant transactions:

1. Books of Accounts, Bank Statements and vouchers
2. Filings with Stock Exchanges, Registrar of Companies and other statutory authorities.
3. Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retiral related Records, etc.
4. Corporate Social Responsibility Records
5. Sponsorship Projects Records
6. Correspondence and Internal Memoranda
7. Any other record as may be decided by the Chief Executive Officer of the Company from time to time.

DISCLOSURES

The Company shall disclose this Policy on its website and a web link thereto shall be provided in the Annual Report.