

POLICY FOR PRESERVATION OF DOCUMENTS & ITS ARCHIVAL

I. INTRODUCTION

The Securities and Exchange Board of India (“SEBI”) vide its notification dated September 02, 2015 issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR Regulations”). These regulations came into force from December 01, 2015. Regulation 9 and 30(8) of SEBI LODR Regulations states that all the Listed Companies shall frame a policy for preservation of documents and archival policy. Company has in light of the above requirements framed a Policy for preservation of documents and its archival (“Policy”). This Policy has been adopted by the Board of Directors of the Company.

The Board of the Directors of the Company have in their meeting held on 31/03/2018 reviewed, modified and adopted this policy to align the same with the applicable laws, rules and regulations.

This policy is made in alignment with Company’s Vision and Values to achieve the Mission & Objectives and aims at enhancing ethical and transparent process in managing the affairs of the Company.

II. OBJECTIVE AND APPLICABILITY

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same.

This policy is applicable to all the Documents maintained in physical and electronic mode by the Company. The Documents not covered under this Policy shall be preserved and maintained in accordance with the provisions of the respective Acts, Rules, Guidelines and Regulations as applicable under which those documents are maintained.

III. POLICY ON PRESERVATION OF DOCUMENTS

The regulation requires the Board to frame a policy for preservation of documents classifying them into following categories:

1. Documents whose preservation shall be permanent—

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently. Details of documents whose preservation shall be permanent in nature is listed in Annexure–A.

2. Documents with preservation period of not less than eight years after completion of the relevant transactions—

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a period of not less than eight years after completion of the relevant transactions shall be preserved accordingly. Detail of documents with preservation period of not less than eight years after completion of the relevant transactions is listed in Annexure–B.

3. Documents with preservation period other than those mentioned in (2) above —

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a preservation period of other than those mentioned in 1 & 2 above shall be preserved accordingly.

IV. WEB ARCHIVAL POLICY

1. The Company shall disclose on its website all events or information which has been disclosed to stock exchange(s).
2. Such disclosures shall be retained on the website of the Company for a minimum period of five years.
3. At the end of the fifth year the information shall be archived and preserved for a further period of three years.

ANNEXURE- A

Documents whose preservation shall be permanent in nature:

1. Property records including purchase and sale deeds, licenses, copyrights, patents & trademarks
2. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records
3. Personal files of all employees being associated
4. Any other record as may be decided by the Chief Financial Officer of the Company from time to time

ANNEXURE- B

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 authorizations, attendance records, employee medical records, leave records, Pension and retrial 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 Financial Officer of the Company from time to time

ANNEXURE- C

Documents whose preservation shall be for a minimum period of three years after completion of the event

1. Tender Documents
2. Lease Deeds and Contracts
3. Legal files
4. Insurance Records including policies and claims
5. All e-mail correspondence, internal & external
6. Documents under Secretarial Standards
 - a) Proof of sending notice of the meetings of the Board/committee and General Meetings
 - b) Proof sending Agenda and Notes on Agenda
 - c) Proof of sending and delivery of the draft of the Resolution
 - d) Proof of sending draft Minutes and its delivery
 - e) Proof of sending signed Minutes and its delivery
7. Any other record as may be decided by the Chief Financial Officer of the Company from time to time