

## Preservation of Documents & Archival Policy

### Objective

Certain laws require the Company to retain its records for a particular period of time. These are legally mandated retention requirements. The objective of this Policy is to provide a guideline for the management of such documents.

This Policy is intended to facilitate the Company's compliance with all applicable laws and regulations governing the retention and destruction of the legally mandated records.

### Retention and Maintenance of Records

The documents that shall be retained shall be identified as per below:

1. Those documents whose preservation shall be permanent in nature.
2. Those documents that are required to be retained for a period of not less than 8 years after completion of the relevant transactions, owing to certain legal requirement, pending litigation or the business needs of the Company.
3. Documents that are required for a period other than what is stated in 1 and 2 above.

Records could be required to be retained for varying periods of time as given below:

- a) **Records pertaining to the Board of Directors/ Board Meetings / Meetings of the Committees of the Board:** Minutes of the Board meetings and the Committee meetings shall be maintained for the lifetime of the Company. Copy of all the materials provided to the Board of Directors or Committees of the Board shall be maintained for at least 10 years.
- b) **Disclosures to the Stock exchanges :** All disclosures to the Stock Exchanges made under Regulation 30 of the SEBI ( Listing Obligations and Disclosure Requirements) Regulations shall be maintained for at least 5 years on the website of the Company. Other



disclosures to the Stock exchanges that are required to be uploaded on the website in terms of Regulation 46 of the SEBI ( Listing Obligations and Disclosure Requirements) Regulations shall be maintained for at least 1 year on the website of the Company.

- c) **Books of Accounts and Tax records:** Books of Accounts and related documents shall be retained at least upto the period prescribed under various laws to which they are subject to. Tax records includes books of accounts and related documents, documents concerning tax assessment, tax filings, tax returns, proof of deductions, documents pertaining to appeal preferred against any claim made by the relevant tax authorities, etc.. Tax records shall be maintained upto such period as may be deemed fit by the concerned department after final order on the subject has been received but in any case not less than 8 years.
- d) **Personnel record:** The personal information, recruitment, appraisal records of the employee shall be maintained at least till the employee serves in the Company.
- e) **Documents pertaining to Litigation:** Any record that is relevant to any pending or anticipated litigation, claim, audit, investigation or enforcement action shall be retained at least until final resolution of the matter. In these circumstances, the Company shall identify and preserve any records (including electronic records) and other information that could be relevant to the matter. Employees who become aware that an investigation or legal proceeding has commenced or is anticipated against the Company must notify such contingency, so that all records with potential relevance to the investigation or legal proceeding can be preserved as necessary.
- f) **Legal documents:** Legal documents shall include but shall not be limited to contracts, legal opinions, pleadings, orders passed by any Court or Tribunal, judgments or any interim orders.  
  
Orders passed by any Court or Tribunal or any Authority or Judgment which are final in nature and cannot be superseded shall be retained permanently. Interim Orders shall be retained till a final Order is received or for a period of 8 years, whichever is later.



- g) **Property Documents** : Documents relating to the property owned by the Company shall be retained in perpetuity. Documents relating to leased property shall be retained till the property is leased by the Company.
- h) **Intellectual Property records**: Intellectual Property Rights (IPR) records include, but shall not be limited to Copyrights, Trademarks and Patents. IPR records shall be retained by the Company for the life of the IPR.

Records may be archived in paper or electronic format and should be retrievable.

The Company may opt to hire external agencies for archiving its records depending upon the quantum of records that can be archived, available storage area within the premises and exigencies of the situation.

#### **Disposal and Destruction of Records**

Those documents that are identified as not required by the Company shall be destroyed.

The disposal schedules of the concerned records must meet the regulatory compliance requirements, if required.

If the Company has determined that, consistent with this Policy, it is appropriate to dispose off any records, they can be destroyed in the following ways:

1. Recycle or Shred paper records;
2. Destroy electronically stored data.

Proper record shall be maintained of the documents transferred to the Central Storage place and of those that are destroyed.

The Policy shall be reviewed periodically by the Senior Management and amendments shall be made as deemed appropriate subject to the approval of the Board.

Effective date: The Policy shall be effective from December 1, 2015.

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