

## POLICY FOR PRESERVATION OF DOCUMENTS/ RECORDS

This Policy shall be called "Policy For Preservation of Documents / Records"

### 1. Scope & Objective

The Policy is framed pursuant to SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015 and serves as a guideline for determining the retention period of a document/ records.

The Policy lays down the manner in which documents/ records are to be maintained and their period of retention/preservation.

### 2. Definition

**"Act"** means the Companies Act 2013 and rules framed thereunder

**"Document/s or record/s"** shall mean Statutory Registers, Index of Registers, Minutes of Meetings, Books of Accounts and Financial Statements as defined under the Act, Memorandum/s, Agreements, Contracts, Forms Notices, Returns, Orders, Summons, Requisition or any such other document or records required to be maintained under the Act, or any other Laws, Rules or Regulations for the time being in force and which are maintained in either physical or in electronic form and includes records of Properties and Assets of the Company, Registered Trademarks, Patents and Copyrights.

### 3. Mode of maintaining documents / records

The Company shall maintain its documents in either physical or electronic form. In case the Company chooses to maintain its documents /records in electronic form, the same shall be subject to the conditions prescribed under Rule 27(2) of the Companies (Management & Administration) Rules 2014, the Information Technology Act, 2000 or any other applicable laws and amendment/s made thereto from time to time. The persons responsible for maintaining the records as mentioned in clause 5 below shall ensure that such of the records maintained in electronic form are –

- maintained in the same formats prescribed under the Act and in accordance with all other requirements stipulated in the Act and the rules made there under;
- adequately recorded for future reference;
- capable of being readable, retrievable and reproducible in printed form;
- capable of being digitally signed and dated;
- once digitally signed and dated shall not be capable of being edited or altered

#### **4. Location for maintaining of records**

Documents/ records which are required to be maintained under the Act or any other laws, rules or regulations for the time being in force shall be maintained at the Registered Office or at the Corporate/Head Office or at such other place, provided, in respect of such records, wherever permissible, prior approval of the Board of Directors / Shareholders, as the case may be, shall be sought for retention of the documents at any other place.

Any Documents / Records as mentioned above, if maintained at any other place / premises of a third party, the Company shall enter into a written service level agreement with such third party clearly detailing the terms & conditions of service, retrieval procedure and safety & security of such documents / records.

#### **5. Security of records maintained**

The Company Secretary and Compliance Officer shall be responsible for the maintenance and security of documents/ records of the Secretarial Department and the Share Department.

The Chief Financial Officer shall be responsible for the maintenance and security of documents/ records relating to Finance, Accounts, Treasury and Direct and Indirect Taxation.

Unit Heads / Functional Heads / Heads of Departments shall be responsible for the maintenance and security of documents/ records of their respective Department/s.

They shall take adequate steps to ensure security, integrity, confidentiality of records and adequate protection against unauthorized access, alteration, or tempering of records.

With respect to the maintenance of records in electronic form, the persons responsible for the maintenance of the records shall additionally also ensure –

- against loss of records as a result of damage to or failure of the media on which the systems are maintained;
- that the signatory of electronic records does not repudiate the signed record as not genuine;
- that computers, software and hardware are adequately secured and validated to ensure their accuracy, reliability and consistent intended performance;
- that the records are accurate, accessible and capable of being reproduced for reference later;
- that the records are maintained on software which are not rewritable or erasable such as pdf. version or some other version which cannot be altered or tampered;
- that at least one back up is taken at the end of every week and that such back up is authenticated and dated. Such back up shall be securely kept at a location other than location where the main servers of containing the records are located

and if such main services are located outside India, the back up server shall be kept at a place located within India;

- ensure that any reproduction of non electronic original records in electronic form is complete, authentic, true and legible when retrieved;
- arrange and index the records in a way that permits easy location access and retrieval of any particular record.

## **6. Persons authorized to access records**

The persons responsible for the records shall ensure that access to the records is given to the employees in their respective Units/ divisions/ departments on the basis of the job profile and taking into consideration the need to access documents/ records by such employee in connection with their work.

## **7. Preservation of documents**

Documents are classified as under:

- (i) documents whose preservation shall be permanent in nature;
- (ii) documents whose preservation shall be for such period as specified herein.

### **A. Documents/ records of Permanent nature**

The following documents/ records are of a permanent nature and shall be **preserved permanently**.

1. Register of Members/ Index of Members;
2. Register of Renewed and Duplicate Share Certificates;
3. Disputed cases documents relating to securities of the Company;
4. Register of Charges;
5. Minutes of proceedings of General Meetings, Board Meetings and other Meetings and Resolutions passed by Postal Ballot;
6. Register of Contracts or arrangements in which Directors are interested;
7. Register of loans and guarantees given by the Company
8. Register of Investments made by the Company;
9. Annual Report;
10. Land records and documents connected with purchase of land/ mutation of land in the name of the company.
11. Documents relating to immovable properties standing in the name of the Company;
12. Judgements/ orders passed by a Court of competent jurisdiction or any other competent authority;
13. Licenses and permits granted under any statute/ regulations
14. Any documents/ records which may be required to be preserved permanently under any statute or regulation from time to time.

## B. Documents and Records which are not of a permanent nature

The following documents/ records shall be preserved for such period as is indicated in the table herein below:

Sr No	Particulars of the Document	Preservation / Retention Period
1.	Agenda and accompanying notes for the Board Meetings/ Committee Meetings	10 years from the date of meeting
2.	Forms and documents filed with Registrar of Companies or any statutory & regulatory authorities under the Companies Act or SEBI Regulations	10 years from the date of filing.
3.	Register of Debenture Holders/Index of Debenture Holders	10 years after the maturity/ repayment of the debentures
4.	Register of directors	10 years after cessation of the director
5.	Disclosure by a Director of his interest;	10 years from the end of the financial year to which it relates
6.	Register of Deposits	10 years from the financial year in which the latest entry is made in the Register
7.	Correspondence with the Stock Exchanges	10 years
8.	Records relating to payment of Dividend / paid dividends	10 years from the date of payment
9.	Records relating to transfer and transmission of shares	10 years after transfer/transmission
10.	Cancelled / defaced share certificates	3 years from the date of cancellation
11.	Legal Opinions taken by the Company from time to time	10 years from the date of the event
12.	Year-end financial statements and Auditors Report thereon along with appropriate ledger related year-end trial balances, all other statements and vouchers relevant to any entry in such Books of Accounts	16 years after the assessment is completed
13.	Tax returns filed under direct and indirect tax laws/ regulations along with all related documents;	16 years after the assessment is completed.
14.	Transfer Pricing Agreements	10 years after the expiry of the Agreement
15.	Details of related party transactions	10 years from the end of the relevant Financial Year

16.	Documents relating to creation, modification and satisfaction of mortgage/ hypothecation in favour of the Banks/ Financial Institutions/ Debenture Trustees	10 years after the repayment of the loan/ debentures/ bonds etc
17.	Registration Certificates of Trademarks, Patents /Copyrights	10 years after the expiry of the license

The period of retention for all other documents not expressly mentioned herein shall be decided by the Function Head, Director Plant / Unit Head / Heads of Divisions/ Departments as the case may be from time to time.

### 8. Destruction of Records

The destruction of records shall be done in the manner, if any, prescribed under any statute or regulation. In the event no such procedure is prescribed, destruction of records shall be done after seeking the express written approval of the MD & CEO/ CFO/ Unit Heads/ Functional Heads/ Heads of Departments and a list of the documents/ records so destroyed shall be maintained atleast for a period of five years.

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Date: 09<sup>th</sup> December, 2015