

Policy on Preservation of Documents

1. Objectives

The Policy is framed in accordance with the requirements of Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. The intent of this SOP is to streamline the process of up keeping and maintenance of the Statutory, Secretarial and Strategic records of the company for achieving the following objectives:

- All Statutory and other Legal / Strategic records of the company including its group and associate companies are maintained in a systematic manner
- Prescribing a clearly defined and laid down responsibility matrix for maintenance of all records
- ensuring safety of the Statutory, Secretarial and Strategic records of the company
- Developing an effective document retrieval system so that required document can be accessed on timely basis as and when required
- Ensuring effective compliance of the requirements of law regarding maintenance of Statutory records.

Records : any document, paper, book, letter, drawing, map, audio-visual material, electronic or machine readable document or database, or any other document, regardless of format, created in pursuance of legal requirements, or in the transactions of business, of which it forms a part or provides evidence, or in furtherance of organizational objectives.

Importance of Records

Records in their various forms are valuable organizational asset. They play a vital role in the management and operations of the organization, document past events, and serve as the basis for future actions.

2. Guidelines

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, provides that the listed entity shall have a policy for preservation of documents, approved by its Board of Directors, classifying them in at least two categories as follows –

- a. documents whose preservation shall be permanent in nature ;
- b. documents with preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, the company has classified the preservation of documents to be done in the following manner:

- a. documents that needs to be preserved and retained permanently;

- b. documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or SEBI (LODR) Regulations;
- c. documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company.
- d. where there is no such requirement as per applicable law, then for such period as the document pertains to a matter which is “Current”.

An indicative list of the Documents and the time-frame of their preservation is provided in **Annexure- A. The list of documents and time frame would be reviewed and amended from time to time in compliance with applicable legal provisions.**

3. Modes of Preservation

The Documents may be preserved in

- a) Physical form; or
- b) Electronic Form.

The official of the Company required to preserve the document, shall be Authorised Person who is generally expected to observe the compliance of statutory requirements as per applicable law.

The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

The preserved documents must be accessible at all reasonable times. Access may be controlled by the concerned Authorised Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

Destruction of documents

The documents of the Company which are no longer required as per the time schedule prescribed in the **Annexure A** may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under **Annexure A**. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at **Annexure B**. The entries in the register shall be authenticated by the Authorised Person.

4. Standard Operating Procedure

- ❖ It shall be the responsibility of the Compliance Officer of the company to ensure proper and effective maintenance of all Statutory, Secretarial and Strategic records of the company

- ❖ In addition to the Statutory, Secretarial and Strategic records the Compliance Officer shall ensure proper upkeep and maintenance of such other documents as may be advised and delivered by Director (Finance) / Managing Director from time to time
- ❖ All the Statutory, Secretarial and Strategic records should be appropriately numbered and coded for easy identification and retrieval
- ❖ A list of all Statutory, Secretarial and Strategic records should be maintained and updated regularly
- ❖ Proper filing and storage systems should be used for safe upkeep of all Statutory, Secretarial and Strategic records
- ❖ The authority to access any listed Statutory, Secretarial and Strategic record should vest with the Compliance Officer of the company only.
- ❖ If the records are maintained in electronic form , the Compliance Officer must ensure effective security mechanism to avoid unauthorized access
- ❖ The Compliance Officer may allow supporting staff access and to engage in the process of effective maintenance of Statutory, Secretarial and Strategic records for operational purposes, but overall responsibility shall rest with Compliance Officer only
- ❖ It should be ensured that no markings / notings are inscribed on the original records
- ❖ If a document is taken out from the file / almira then noting should be made in a separate register maintained for keeping record of taken out document. It should contain information as to who has taken the document, date, initials of the person and similarly particulars should be recorded when the document is returned back to base storage place
- ❖ Ensure that proper facilities and equipment are available for the storage of records: equipment and environmental conditions should prevent damage and unauthorized access to records
- ❖ Where the law has prescribed a time period for preservation of certain records, The compliance Officer must ensure that such records are maintained and preserved for prescribed time period
- ❖ All the Statutory records and other Secretarial / strategic documents required to be maintained for future use should be forwarded / handed over to the Compliance Officer by various departments / officials after taking his signatures
- ❖ A bi-annual Audit of the system of maintenance and retrieval of Statutory, Secretarial and Strategic records of the company shall be conducted by the Internal Audit team
The records should be reviewed annually for weeding out and destruction of certain records which may no longer be required to be maintained.

5. Amendments in Policy

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.

ANNEXURE – A

Indicativelist

A) PERMANENT PRESERVATION:

- a. Common Seal
- b. Minutes books of Board, General Meetings and Committee Meetings
- c. Statutory Registers
- d. License and Permissions
- e. Statutory Forms and disclosures except for routine compliance
- f. Scrutinizers’ Reports
- g. Register of Members
- h. Index of Members
- i. Register of Debenture Holders
- j. Index of Debenture Holders

B) TEMPORARY PRESERVATION UPTO 8 YEARS:

- a. Annual Returns
- b. Board Agenda and supporting documents
- c. Attendance Register
- d. Office copies of Notice of General Meeting and related papers
- e. Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers
- f. All notices pertaining to disclosure of interest of directors
- g. Instrument creating a charge or modification
- h. Books of accounts, financial statements etc.
- i. Register of any other security holders

C) OTHERS:

As per applicable law or discretion of the Company, which shall be reviewed on annual basis for their preservation.

ANNEXURE – B

Specimen format of the register of documents disposed of / destroyed

Particulars of document alongwith provision of law	Date and mode of destruction	Initials of the authorised person