



POLICY FOR PRESERVATION OF DOCUMENTS

1. INTRODUCTION

Regulation 9 of The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”) require listed companies to 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.

This Policy is framed in accordance with the requirements of the SEBI LODR Regulations, notified on 2nd September 2015 and other SEBI Circulars specified in this regard, if any.

2. OBJECTIVE

The objective of this Policy is ‘aiding employees of the Company in understanding their obligations in retaining physical documents and electronic documents’.

The policy is formulated to manage the Company’s information in a structured manner, to retain information for as long as it has a business purpose, to satisfy statutory or regulatory requirements, and to protect information which is vital to the Company.

3. SCOPE

This policy covers all information created, received, managed and retained by the Company (including all its units and divisions), in hard copy and electronic records.

Information, under this policy, includes all hard copy and digital information created or received in connection with the business of the Company including originals and copies of correspondence, recordings, work papers, video tapes, photographs, product specifications, reports etc.

This policy extends to all locations of the Company.

4. RESPONSIBILITY

It is the responsibility of the respective heads of all departments/Information Owners to assure the implementation of this Policy, in terms of managing the records and information of their respective department. This responsibility may be delegated to an assigned employee, not being below the Grade of ‘Manager’ who would be responsible for developing the listing of records and their respective preservation schedules along with its regular updation.

It follows that the concerned responsible officer should, in line with this Policy and as per applicable law:

- destroy papers and electronic data for which there is no continuing business need and send papers that should not be destroyed to archive within as short a time as possible
- keep data secure while it remains in any office
- keep track of where information is stored
- continue to apply good practices to avoid stockpiling of papers in the future



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A database of all archived materials should be stored at each department level. The records which are confidential in nature, should have selected access as may be determined by the Head of respective departments/Information Owners.

5. POLICY

Retention Schedules:

All corporate functions shall ensure maintenance of records (physical/electronic), for minimum retention periods as specified in this Policy, Safety safeguards and protocols for maintenance of inventory of records pertaining to them.

The retention periods will be determined by factors such as the information's useful life within the Company, requirements of applicable law and requirements of regulatory bodies.

The Companies Act, 2013 ("the Act") and Secretarial Standards provide a period up to which certain documents / registers are to be preserved. The Company shall ensure that maintenance of these documents are in line with the period mentioned in the Companies Act, 2013 and Secretarial Standards as amended from time to time, except in so far as may be mandated for a longer period by any other law applicable for the time being in force. Given below in **Annexure A** are illustrative list of documents and their preservation period under the Act/Secretarial Standards.

Retention schedules for other departments and the documents which are not listed in Annexure A shall be preserved for such period as may be required by law, as amended from time to time. Where there is no statutory time frame specified for preservation it may be preserved as per its useful life or as may be directed by the CEO or the CFO of the Company.

Records shall be broadly classified as per following for retention: Permanent Records:

Permanent records are records which are of strategic importance and vital to the organization. These records shall be kept permanently, e.g. records and documents such as Memorandum and Articles of Association, Board and Committee Minutes, Registers which are required to be permanently maintained under the Companies Act or other applicable laws.

Other Records:

Such records as are required to be maintained for minimum 8 years on account of statutory considerations and are important from the perspective of financial record keeping, e.g. books of accounts, vouchers, Financial Statements, invoices and all deeds / agreements which are the basis for the financial transactions should be preserved for minimum 8 years from the closure of the contract.

Temporary Records:

Temporary records are the records which are required to be retained as long as it has a business purpose or are required to be retained as per relevant business regulations e.g. Operational documents such as rating letters, research reports, working papers, etc.

There could be some records such as proof of sending Board notices, Agendas etc, which are required to be preserved for such period as may be specified by law/ by Board from time to time.



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Destruction of records:

The records which are no longer required after the statutory retention period should be reviewed and destroyed under instructions of the Head of the Department. The instruction for the destruction of the record must be provided in writing by the Head of the Department/Information Owners.

Record Management Procedure:

Each business unit/ corporate function / department shall assure that records maintained in its offices, or stored outside the office environment are appropriately identified and maintained to assure accurate and prompt retrieval.

6. GENERAL AUTHORISATION

The Policy shall be reviewed on a periodic basis. The CEO and CFO be severally authorized to make such changes as may be deemed necessary or as warranted by law.

7. DATA ARCHIVAL

The archived documents shall be removed / deleted from the website after expiry of five years from the date of its initial upload in accordance with its Archival Policy of the Company.

8. SCOPE LIMITATION

In the event of any conflict between the provisions of this Policy and of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 / Companies Act, 2013 or any other statutory enactments, rules, the provisions of such Regulations/ Act or statutory enactments, rules shall prevail over this Policy.



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Annexure A

Permanent Records

Sr No.	Section/Rules/Clause	Type of Document	Specified
1.	Section 7(4)	Memorandum of Association and Articles of Association	
2.	Section 186(9) and Rule 12 of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of loans, guarantee, security and acquisition of securities made by the company	No. MBP 2
3.	Section 187(3) and Rule 14 of the Companies (Meetings of Board and its Powers) Rules, 2014.	Register of investments not held in its own name by the company	Form No. MBP 3
4.	Section 189(1) and Rule 16 of the Companies (Meetings of Board and its Powers) Rules, 2014.	Register of contracts or arrangements in which directors are interested	Form No. MBP 4
5.	Section 85 and Rule 10 of Companies (Registration of Charges) Rules, 2014	Register of charges	Form No. CHG 7
6.	Section 88 and Rule 15 of the Companies (Management and Administration) Rules, 2014.	Register of Members along with index of the names	Form No. MGT.1
7.	Section 88 and Rule 15 of the Companies (Management and Administration) Rules, 2014.	Foreign register of members	Form No. MGT.3
8.	Rule 25(1) of the Companies (Management and Administration) Rules, 2014 and Clause 18.1 of revised SS2	Minutes of General Meeting	-
9.	Rule 25(1) of the Companies (Management and Administration) Rules, 2014 and Clause 8.1 of revised SS1	Minutes of Board or Committee Meetings	
10.	Rule 6 of the Companies (Share Capital and Debentures) Rules, 2014.	Register of Renewed and Duplicate Share Certificates	No. SH.2



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Other Records:

Sr No.	Section/Rules/Clause	Type of Document	Preservation Period	Form Specified
11.	Section 128(5)	Books of Account including vouchers relevant to any entry in such books of account	8 financial years preceding current FY.	-
12.		Disclosures / Notices by a director of his interest	For a period of 8 years from the end of the financial year to which it relates	Form No. MBP 1
13.	Rule 14 of Companies (Acceptance of Deposits) Rules, 2014	Registers of deposits	For a period of not less than 8 years from the financial year in which the latest entry is made in the register	-
14.	Section 85 and Rule 10 of the Companies (Registration of Charges) Rules, 2014	The instrument creating a charge or modification	For a period of 8 years from the date of satisfaction of charge by the company	-
15.	Section 88 and Rule 15 of Companies (Management and Administration) Rules, 2014.	Register of debenture-holders or any other security holder, along with index of the names	For a period of 8 years from the date of redemption of debentures or securities.	Form No. MGT.2
16.	Section 88 and Rule 15 of the Companies (Management and Administration) Rules, 2014.	Foreign register of debenture-holders or any other security holder	For a period of 8 years from the date of redemption of such debentures or securities	-
17.	Section 88 and Rule 15 of Companies (Management and Administration) Rules, 2014.	Annual return and copies of all certificates and documents required to be annexed thereto	For a period of 8 years from the date of filing with the Registrar	-
18.	Rule 7 of the Companies (Share Capital and Debentures) Rules, 2014.	All books and documents relating to the issue of share certificates, including	Not less than 30 years and in case of disputed cases shall be preserved permanently	-



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		the blank forms of share certificates		
19.	Rule 7 of the Companies (Share Capital and Debentures) Rules, 2014.	All certificates surrendered to a company shall immediately be defaced by stamping or printing the word "cancelled" in bold letters	May be destroyed after the expiry of 3 years from the date on which they are surrendered, under the authority of a resolution of the Board and in the presence of a person duly appointed by the Board in this behalf.	-
20.	Rule 3(2)(d) of the Companies (Meetings of Board and its Powers) Rules, 2014	Tape recording(s) or other electronic recording mechanism used for Board meetings held through video conferencing or audio-visual means	At least up to the time of completion of audit of that particular year	-
21.	Clause 4.1.6 of SS1	Attendance register of Board and Committee Meeting	For a period of at least 8 financial years from the date of last entry made therein and may be destroyed thereafter with the approval of the Board.	-
22.	Clause 8.2 of SS1	Office copies of Notices, Agenda, Notes on Agenda and other related papers of Board and Committee Meeting	To be preserved in good order in physical or in electronic form for as long as they remain current or for 8 financial years, whichever is later and may be destroyed thereafter with the approval of the Board.	-
23.	Clause 18.2 of revised SS2	Office copies of Notices, scrutinizer's report, and related papers of the General Meeting	To be preserved in good order in physical or in electronic form for as long as they remain current or for 8	-



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			financial years, whichever is later and may be destroyed thereafter with the approval of the Board.	
24.	7.4 and 7.6.4 of SS1	Proof of sending minutes and delivery	As may be authorized by the Board (which shall not be less than 3 years from the date of the meeting)	-
25.	1.3.1. of SS1	Proof of sending Notices and its delivery	Same as above	-
26.	1.3.7. of SS1	Proof of sending Agenda, Notes to Agenda and its delivery	Same as above	-
27.	6.2.2. of SS1	Proof of sending and delivery of the Circular Resolutions	As may be authorized by the Board (which shall not be less than 3 years from the date of circulation of such Resolution)	-
28.	1.2.2 of SS2	Proof of Notices of General Meetings, Failed transmissions and proof of re-sending	As may be authorized by the Board (which shall not be less than 3 years from the date of the meeting)	-
29.	Regulation 46(2) (oa) of the SEBI (Listing Regulations and Disclosure Requirements) Regulation, 2015	Audio recordings, video recordings and transcripts of post earnings / or quarterly calls.	For a period of 8 years from the date of the earnings / or quarterly calls	-