

## **POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS**

### **1. Background:**

The Board of Directors (“the Board”) of the Company in its meeting held **on October 27, 2020 (“effective date”)** approved the Policy on Preservation and Archival of Documents. The policy has been framed in compliance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements). The policy covers the archival mechanism of documents as stipulated in Regulation 30(8) of the SEBI (Listing Obligations and Disclosure Requirements). The said regulation also requires every Listed Company to make available an Archival policy on the website.

### **2. For the purpose of this policy:**

- (a) “Document” refers to papers, notes, agreements, notices, advertisement, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, the time being in or otherwise, maintained on paper or in Electronic form received or kept in pursuance of the Act or under any other law.
- (b) “preservation” shall mean to keep in good order and to prevent from being damage or destroyed.

### **3. For the purpose of preservation of documents, the documents shall be classified into the following three categories:**

Category A: Documents whose preservation shall be permanent in nature.

Category B: Documents with preservation period of not less than eight years after completion of relevant transactions.

Category C: Documents not falling in Category A or Category B above.

### **4. The following shall be Category A record and shall be preserved permanently:**

Register of Members including an Index thereof, Foreign Register of Members, Register of loans, guarantee, security and acquisition made by the Company, Register of investments not held in Company’s own name, Register of Contracts with related party, Register of Contracts in which director is interested, Minutes of Board Meetings, General Meetings and Committee Meetings, Register of Renewed and Duplicate Share Certificates, Register of Charges, Register of Directors and KMP, Signed and Stamped Memorandum and Article of Association of the Company, Intellectual property documents shall include, but shall not be limited to copyrights, trademarks, patents, and industrial designs. Intellectual property rights that are owed by the Company shall be retained by the Company permanently.

### 5. The following shall be Category B & C:

The document specified in column (2) of the Table below shall be record to be preserved up to the duration as mentioned in column (3) of the said table and may be destroyed thereafter as mentioned in this policy.

S. No.	Name of Record	Time up to which record to be preserved
1.	Books of Accounts (as per Companies Act, 2013 & Income Tax Act, 1961)	Category B: 8 financial year preceding current financial year
2.	Disclosures/Notices by a Director of his interest	Category B: 8 years from the end of the financial year to which it relates
3.	Register of Deposits	Category B: 8 years from the financial year in which latest entry is made
4.	Instrument creating a charge or modification	Category B: 8 years from the date of satisfaction of charge
5.	Register of Debenture holders including an Index & Foreign register of Debenture holders	Category B: 8 years from the date of redemption of debentures
6.	Annual Return	Category B: 8 years from the date of filing with ROC
7.	Attendance registers, notices, notes on agenda and other related papers of general meetings, board meetings and various committee meetings;	Category B: 8 years after completion of relevant transactions.
8.	Instrument creating a charge or modifying a charge, if any;	Category B: 8 years after closure of relevant transactions.
9.	Legal documents including but not limited to contracts, legal opinions pleadings, orders passed by any court or tribunal, judgments, interim orders, documents relating to cases pending in any Court or Tribunal or any other authority empowered to give a decision on any matter, awards, documents relating to property matters.	Category B: 8 years after completion or termination in case of Legal contracts and for others, 8 years from the date of statutory order passed, if any.
10.	Employment/personnel record in case of employees of the Company;	Category B: 8 years after termination of employment.
11.	Record under Central Excise, Customs or GST Acts	: 5 years immediately after the financial year to which record pertains
12.	Transfer Pricing	Category B: 10 previous years

13.	Record related to Audit	Category B: 10 years
14.	Other Record	Category C: 3 years
15.	Events disclosed to Stock Exchange under Regulation 8 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015	Category C: Five Years

#### **6. Mode of Maintenance:**

The Company shall maintain these documents either in physical or electronic mode. The applicable provisions of law, rules and regulations with regard to electronic maintenance of records shall be adhered to by the Company, if maintained in electronic mode.

#### **7. Notwithstanding anything to the contrary that may be contained in this policy:**

- (a) if the law provides for preservation of a record for a period longer than that mentioned in the Table above, then the said record shall be preserved for that longer period.
- (b) if an order in writing from a court (or any statutory authority empowered to pass such an order) is received directing the company to preserve any of the record beyond the period specified in the above Table, then that record shall be preserved till the said order is in force.
- (c) if a dispute comes to the knowledge of the Company concerning the existence or non- existence or contents of any of the above record(s) within the period mentioned in the above Table, then the said record may be preserved till the dispute gets settled.

#### **8. Archival Mechanism on Website:**

The event / information disclosed to the stock exchanges under this Policy shall also be placed on the website of the Company for a minimum period of five years or for such other period, if the period prescribed shall be more than five years by the aforesaid Regulations and /or the Securities Laws as defined in the aforesaid Regulations.

After completion of the minimum period of five years or such other period as prescribed by the Regulations and/or Securities Laws the events or information shall be archived by the Company for a further period of one year. Thereafter such events or information may cease to be displayed on the website of the Company.

#### **9. Disposal and Destruction of Documents:**

After expiry of the statutory retention period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

The company shall maintain a register wherein it shall enter brief particulars of the record destroyed and all entries made therein shall be authenticated by the Company Secretary or such other persons as may be authorized by the Board for the purpose. The format of such register has to be in accordance as mentioned in the Annexure-I of this policy.

**10. The Board shall have inherent powers to amend this policy from time to time.**

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**Annexure-I****The format of the Register of Documents Disposed/Destroyed**

<b>Particular of Document along with the provision of applicable law</b>	<b>Date and Mode of destruction</b>	<b>Signature of Authorized person</b>