

PRESERVATION OF DOCUMENTS / ARCHIVAL POLICY

Preamble:

This policy attempts to preserve and maintain documents of the organization. During the course of business, the Company generates several documents either in physical or in electronic mode. Most of the documents are useful for a short span of time and are kept for a definite period, but some documents may be required to be maintained permanently during the lifetime of the organization. In order to preserve such documents, the Company needs to implement a well-considered, well-documented plan to ensure that they remain in good condition over a period of time.

Purpose of the policy:

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical.

A good document preservation program is fundamental to the Company's commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents.

This policy seeks to ensure that the Company's business is adequately documented that are then managed in accordance with best practice.

Preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability.

Scope:

This policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

Effective Date

The Policy as approved by the Board of Directors shall be effective from 1st December, 2015.

Legislative Framework and Standards

The Securities market regulator- Securities and Exchange Board of India (SEBI) vide its notification issued on 2nd September, 2015 has repealed the clauses under Listing Agreement entered into by the Companies with the Stock Exchange(s) and has put in place Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 to come into force from the 90th day from the date of publication in the Official Gazette (i.e. from 1st December, 2015).

- Companies (Preservation and Disposal of Records) Rules, 1966
- Companies Act, 2013.
- Securities and Exchange Board of India (Listing Obligations And Disclosure Requirements) Regulations, 2015.

Creation of Documents

All employees of the Company are required to create accurate documents regarding their respective matters. The documents should:

- i. facilitate necessary action by employees and their successors at any level at all points of time;

- ii. facilitate proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;
- iii. protect the financial, legal and other rights of the organisation, its clients and any other people affected by its actions and decisions.

Maintenance of Documents

Every official /employee of the Company is responsible for making and keeping the documents as may be necessary to fully and accurately record the functions, activities, transactions and affairs of the Company. They must handle the documents sensibly and with care and preserve them to avoid any damage before its prescribed time limit.

1. Digital documents can be maintained in forms such as emails, web pages or database records, plus scanned versions of papers that have been digitised in business processes.
2. Physical documents to be maintained in books and files.
3. All digital and physical records to be saved at the registered office of the Company and no physical records can be migrated without permission of the respective Department Head.
4. A reproduction of any original record on microfilm or on any other medium shall be certified by the respective Head of Department of the Company to be a true and accurate reproduction of the original of such document.

Disposal and Destruction of Documents

1. The documents shall be preserved as per Appendix-A , SEBI Listing Obligations & Disclosures Requirements) Regulations, 2015 or such other period as may be prescribed under any law for the time being in force and thereafter the records can be destroyed. Utmost care is to be taken to ensure that files are well preserved.

2. The Company shall maintain a register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the Department Head for the purpose. Inspection of this register is restricted.

Amendment/Review

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit or from time to time and the decision of the Board in this respect shall be final and binding.

This policy shall be subject to review as may be deemed necessary and to comply with any regulatory amendments or statutory modifications and subject to necessary approval of the Board of Directors.

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APPENDIX-A

DOCUMENTS PRESERVATION SCHEDULE

The Documents Preservation Schedule is organized as follows:

Section Topics

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and papers
- E. Property Records
- F. Projects Records
- G. Correspondence and Internal Memo
- H. Insurance Records
- I. Personnel Records
- J. Electronic Records

A. Corporate Records

Sr. No.	Record Type	Preservation Period
	Documents to be retained permanently	
1.	Statutory Registers	Permanent
2.	Register of Members	Permanent
3.	Index of Members	Permanent
4.	Licenses and Permissions	Permanent
5.	Statutory Forms except for routine compliance	Permanent
6.	Scrutinizers Reports	Permanent
7.	Common Seal Register	Permanent
8.	Minutes Books of Board, Committees and General Meetings	Permanent

Sr. No.	Record Type	Preservation Period
	Documents to be retained for a minimum period of 8 years	
1.	Attendance Registers – Board, Committees and General Meetings	8 years
2.	Office copies of Notice, Agenda of Board Meeting / General Meetings and related papers	8 years

B. Accounts and Finance

Sr. No.	Record Type	Preservation Period
	Documents to be retained permanently	
1.	Annual Audit Reports and Financial Statements	Permanent

Sr. No.	Record Type Documents to be retained for a minimum period of 8 years	Preservation Period
1.	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or after completion of assessment under applicable laws whichever is later
2.	Bank Statements	8 years
3.	Investment Records	8 years

Sr. No.	Record Type Miscellaneous	Preservation Period
1.	Annual Plans and Budgets	3 years
2.	General Correspondence	2 years

C. Tax Records

Sr. No.	Record Type Documents to be retained for a minimum period of 8 years	Preservation Period
1.	Tax Exemption and Related documents	8 years
2.	Payment challans	8 years
3.	Excise Records	8 years
4.	Tax Deducted at Source (TDS)Records	8 years from the end of Financial Year or after completion of assessment under applicable laws whichever is later
5.	Income Tax Records	8 years from the end of Financial Year or after completion of assessment under applicable laws whichever is later
6.	Service Tax Records	8 years from the end of Financial Year or after completion of assessment under applicable laws whichever is later

D. Legal Files and Records

Sr. No.	Record Type Documents to be retained permanently	Preservation Period
1.	Court Orders	Permanent

Sr. No.	Record Type Documents to be retained for a minimum	Preservation Period
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	period of 8 years	
1.	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts

Sr. No.	Record Type Miscellaneous	Preservation Period
1.	Legal Memoranda and Opinions subject matter files	3 years after the close of matter
2.	Litigation files	3 years after the close of litigation

E. Property Records

Sr. No.	Record Type Documents to be retained permanently	Preservation Period
1.	Original Purchase and Sale Agreements / Deeds	Permanent
2.	Property Card, Ownership records issued by Government Authority	Permanent

F. Project

Sr. No.	Record Type Miscellaneous	Preservation Period
1.	Project Documents and Related correspondence (including any proposal of the Project and its approval)	3 years from the date of completion of the project

G. Correspondence and Internal Memo

Sr. No.	Record Type Documents to be retained for a minimum period of 8 years	Preservation Period
1.	Those pertaining to Non- routine matters or having significant lasting consequences	8 years

Sr. No.	Record Type Miscellaneous	Preservation Period
1.	Correspondence and Memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g <ul style="list-style-type: none"> - Routine letters, notes that require no acknowledgement or follow-ups such as inter office memo, letters for transmittal and plans for Meetings 	2 years

	<ul style="list-style-type: none"> - Letters of general enquiry and replies that complete cycle - Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary 	
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H. Insurance Records

Sr. No.	Record Type Documents to be retained permanently	Preservation Period
1.	Master Policies and related documents	Permanent

Sr. No.	Record Type Miscellaneous	Preservation Period
1.	Insurance Policies for moveable / immovable assets, vehicles etc	2 years from the date of expiry However, in case of any claims pending in respect of such policies, the same shall be preserved till the settlement of such claims.
2.	Inspection / Survey Reports	2 years
3.	Claim Records	12 months after settlement of the Claims.

I. Personnel Records

Sr. No.	Record Type Documents to be retained for a minimum period of 8 years	Preservation Period
1.	Payroll Registers	8 years
2.	Bonus, Gratuity and other Statutory Records	8 years
3.	Time office Records and Leave Cards	8 years
4.	Unclaimed Wages Records	8 years

Sr. No.	Record Type Miscellaneous	Preservation Period
1.	Employees Information Records	3 years after separation

J. Electronic Records

Sr. No.	Record Type	Preservation Period
1.	Electronic Mail <ul style="list-style-type: none"> - All E-mails from internal and external sources that are important and have significant impact and lasting consequences. 	Permanent
	<ul style="list-style-type: none"> - All E-mails from internal and 	2 years

	<p>external sources that are not important and have no significant impact and lasting consequences.</p> <p><i>*Staff will not store or transfer the Company related email except as necessary or appropriate with due approvals from the Central IT team and their respective Managers.</i></p> <p><i>*Staff will take care not to send confidential / proprietary information to outside sources.</i></p> <p><i>* Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employee's workplace.</i></p>	
<p>2.</p>	<p>Electronic Documents including PDF files</p> <ul style="list-style-type: none"> - PDF documents – Can be a maximum period of 5 years. But the said document may be destroyed depending upon the completion of the job or its use coming to an end. - Text/ Formatted files: All word / excel / Power point files may be deleted once every year depending on the importance or lack of it. 	<p>5 years</p>
<p>3.</p>	<p>Web page files</p> <ul style="list-style-type: none"> - To be retained for a period of 5 years as specified in the Listing Regulations. - To be archived by the I.T. Department with the support of the service provider for a period of 3 	<p>5 years</p>