

POLICY ON PRESERVATION OF DOCUMENTS

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PREAMBLE:

This Policy is framed in compliance with the requirements of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

OBJECTIVE:

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and for systematic identification, categorization, maintenance, review, retention and disposal/ destruction of documents and records received or created in the course of business.

ADMINISTRATION AND OBLIGATION OF THE HEAD OF DEPARTMENT OF THE COMPANY:

The Company Secretary and the Compliance Officer of the Company, (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure Preservation of documents and records.

The heads of respective departments are obligated to ensure the preservation of documents pertaining to their area of responsibilities in accordance with the applicable laws/ regulation in consultation with the Administrator. The Head of the Department shall mean the Officers of the Company heading a department irrespective of designation.

PRESERVATION OF DOCUMENTS AND RECORDS:

The Documents and Records for Preservation can be classified in 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 transaction.

Provided that the Company may keep documents specified in clauses (a) and (b) in electronic mode.

PROCESS:

A) Permanent Preservation:

- 1) All documents filed with Ministry of Corporate Affairs.
- 2) All documents filed with SEBI / BSE / NSE.
- 3) All documents filed with Tax Authorities in Income Tax, Service Tax, VAT & similar tax authorities.
- 4) All permits, licenses, authorization from any statutory authorities.
- 5) Audited Accounts
- 6) Documents relating to investment in subsidiaries.
- 7) Any other document required to be preserved permanently under any law / statute.
- 8) Agreement signed by the Company with Customers, Parties, Banks and similar authorities.

B) Preservation for 8 years:

- 1) Bank, cash vouchers, payment vouchers, warrants
- 2) Bank statements
- 3) Purchase bills
- 4) Sales invoices, Debit / credit notes, etc.
- 5) Accounting records
- 6) Any documents related to correspondence with Customs at CFS
- 7) Any other documents required to be preserved for 8 years under any law / statute.

C) Other Documents maybe stored and preserved in physical form/ electronic form, after the completion of the relevant transactions, for such period as may be required, in each case.

Electronic Mail:

Electronic mails shall be preserved for a period of 3 years. A regular backup of the emails shall be taken and kept in a safe place.
