**POLICY ON PRESERVATION OF DOCUMENTS**

The Securities and Exchange Board of India (SEBI), vide notification dated 2nd September, 2015, issued SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. These Regulations would come into force on the ninetieth day from the date of notification. i.e 1st December, 2015.

The Board of Directors of …………………………………………….. (the “Company”) has adopted the following policy with regards to preservation of documents in terms of Regulation 9 of Chapter IV of Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 (‘LODR”).

The board may review and amend this policy from time to time.

**DEFINITIONS**

**“Regulations”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

**“Act”** means the SEBI Act, 1992 read with the Securities Contract (Regulation) Act, 1956 and Companies Act, 2013.

**“Board”** means the Board of Directors of the Company or its Committee.

**“Company”** means ……………………………………….

**“Document(s)”** means documents as defined in Section 2(36) of the Companies Act, 2013.

“**Electronic form”** as defined in Section 2(1)(r) of the Information Technology Act, 2000, means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

**“Electronic record”** as defined in Section 2(1)(t) of the Information Technology Act, 2000, means data, record or data generated, image or sound stored, received or sent in an electronic form or micro film or computer generated micro fiche.

**“Maintenance”** means maintaining documents and records either physically or electronically.

**“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed**.**

All other terms used in this policy have the same meaning as defined in applicable Act, Rules and Regulations.

**PURPOSE**

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires that every listed company shall have a policy for preservation of documents approved by the Board of Directors.

As per the said regulations the documents should be classified in at least two categories, namely

1. Documents whose preservation shall be permanent in nature;
2. Documents with preservation period of not less than eight years after completion of the relevant transactions.

Accordingly, the policy is framed in the manner prescribed in the Regulations.

The list is appended as Annexure 1.

**MAINTENANCE AND PRESERVATION OF RECORDS**

As per requirement of the Companies Act, 2013 some of the documents are to be preserved permanently. There are some other documents which may be preserved for at least eight years. The Company will follow the provisions of the applicable law in this respect.

Pursuant to Section 120 of the Companies Act, 2013 read with Rule 27 of the Companies (Management and Administration) Rules, 2014, Company may maintain its records as required to be maintained under the Act or Rules made there under in electronic form.

**APPROVAL OF POLICY AND MODIFICATION THEREOF**

Pursuant to Rule 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the policy was approved by the Board of Directors of the Company in its meeting held on November 14th, 2015.

The Board has the right to modify the policy in line with the requirement of law.

14th November, 2015 Chairman

**ANNEXURE -1**

**Types of Records**

1. **Accounting and Finance Records including Annual Financial Statements**

|  |  |
| --- | --- |
| **Record Type** | **Retention Period** |
| Annual Audit Reports & Financial Statements | Permanent |
| Annual Audit Records, including work papers and other documents that related to the audit, including detailed file related to annual audit | 8 years after completion of Audit |
| Annual Plans & Budget | 3 years after the budget year is closed |
| Bank Statement | 8 years |
| General Ledger | Permanent |
| Interim Financial Statements | 8 years |
| Investment Records | Permanent |
| Voucher(Bank, Cash and Journal) | 8 years |
| Purchase Register along with Bills | 8 years |
| Sales Register along with Invoices | 8 years |

1. **Insurance Records**

|  |  |
| --- | --- |
| **Record Type** | **Retention Period** |
| Claims Files (including correspondence, medical records, injury documentation, etc. | 8 years |
| Group Insurance Plans-Active Employees | 8 years |
| Insurance Policies for the Company | 8 years |
| Releases and Settlements | 8 years |

1. **Tax Records**

|  |  |
| --- | --- |
| **Record Type** | **Retention Period** |
| Tax related correspondence | 8 years |
| Payroll Tax Records | 8 years |
| Tax Bills, Receipt, Statements | 8 years |
| Tax Returns | Permanent |
| Sales/VAT Tax Records | 8 years |
| Service Tax Records | 8 years |

1. **Corporate Records**

|  |  |
| --- | --- |
| **Record Type** | **Retention Period** |
| Corporate Records (certificate of incorporation, commencement of business, listing agreement, common seal, minutes book of board and committees thereof, annual reports originals, etc,) | Permanent |
| Licence & Permits, Industrial entrepreneurial Memorandum, and other statutory approvals | Permanent |
| Contracts entered into by the Company | Permanent |
| ROC Fillings & Stock Exchange Filing in physical and Electronic form | Permanent |
| All Statutory Registers under any applicable laws | Permanent |
| Legal Files & Records | Permanent |
| Property Records | Permanent |
| Payroll, Personnel and HR Records | Permanent |
| Production Records | 8 Years |