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## POLICY ON PRESERVATION OF DOCUMENTS

1. **LEGISLATIVE FRAMEWORK AND STANDARDS**

* Companies Act, 2013 and the applicable rules framed thereunder
* Securities and Exchange Board of India (Listing Obligations And Disclosure Requirements) Regulations, 2015.

## RESPONSIBILITY OF RECORD KEEPING

* **MANAGERS**

Management-level staff is responsible for implementing and maintaining sound record keeping practices within their respective administrative units. Managers must ensure that Records are created, maintained and stored in accordance with the standards outlined in this policy, and that no Records are destroyed before their prescribed time limit.

## STAFF

Every member of staff is responsible for making and keeping such Records as may be necessary to fully and accurately record the functions, activities, transactions, operations, policies, decisions, procedures, affairs, administration and management of the Company. Staff members are to handle Records sensibly and with care and respect so as to avoid damage to the Records and prolong their life-span.

## CREATION OF RECORDS

* In accordance with this policy, all staff is required to create full and accurate Records which adequately document the business activities in which they take part.
* Records should be full and accurate to the extent necessary to:
  + facilitate action by employees, at any level, and by their successors;
  + make possible a proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;
  + protect the financial, legal and other rights of the organization, its clients and any other people affected by its actions and decisions.

## MAINTAINENCE OF RECORDS

* The content and essential characteristics of digital Records must remain unchanged through preservation.
* Digital Records can be maintained in forms such as emails, web pages or database Records, plus scanned versions of paper Records that have been digitized in business processes.
* Physical Records to be maintained in books and files.
* All digital and physical Records to be saved at the registered office or any other office as may be approved by the Board of the Company and no physical Records can be migrated without permission of Company Secretary.
* A reproduction of any original record on microfilm or on any other medium shall be certified by a Director or the Company Secretary of the Company to be a true and accurate reproduction of the original of such record.

## DISPOSAL AND DESTRUCTION OF RECORDS

* All Records mentioned in Annexure A which are temporary in nature must be preserved for not less than 8 years or such other period as may be prescribed under any law for the time being in force and thereafter the Records can be destroyed. However, all Records mentioned in Annexure B need to be preserved by the Company permanently during the entire life of the Company. Utmost care is to be taken to ensure that files are neither prematurely destroyed nor kept for period longer than necessary.
* Notwithstanding the general guidelines specified in Annexure A and Annexure B, care should be taken by the respective departments to ensure that Records of special nature such as unsatisfied claims by or against the Company, suits pending in courts, tribunals, quasi- judicial, mediation and alternate dispute for a etc. are preserved according to specific needs and even beyond the prescribed period. Also, in the case of statutory Records such as licenses, certificates, sanctions, approvals, etc.
* From Government/ Statutory Bodies, care should be taken to maintain and preserve the Records in accordance with the specific guidelines/instructions, if any, by the issuing authority.
* 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 Secretary or such other person as may be authorized by the Board for the purpose. Inspection of this register is restricted.
* The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents, required to be preserved for long periods or permanently, the same should be preserved in fire proof or secure cabinets.

## Limitation and Amendment

In the event of any conflict between the provisions of this Policy and of the Companies Act, 2013 (and the rules framed thereunder) or the Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Agreement or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment / modification in the Listing Regulations, Companies Act, 2013 (and the rules framed thereunder) and/or applicable laws in this regard shall automatically apply to this Policy.

## DISCLOSURE:

This Policy will be communicated to all operational employees and other concerned persons of the Company and be disclosed on the Company’s website

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| Sr. No. | Annexure A  (Records that need to be preserved for 8 years) | Annexure B  (Records that need to be preserved permanently) |
| 1. | Proxy forms | Certificate of incorporation |
| 2. | Representation letters | Certificate of change of name (if any) |
| 3. | Inward file giving information about the various correspondence received from outside agencies requiring secretarial  Action | Memorandum and Articles of Association as amended from time to time |
| 4. | Circular resolutions | Counter folios of Share Certificates issued from time to time |
| 5. | Annual reports | Licenses Issued and permissions by Regulatory Authority. |
| 6. | Consent and Resignation Letters received from the Directors | Statutory registers maintained under the Companies Act 2013 |
| 7. | Central Government Approvals received | Common Seal (if applicable) |
| 8. | NSDL/CDSL Files | Minutes books of books of board, General meetings and Committees Meetings |
| 9. | Annual financial statements including: | Statuary forms and disclosure except for routine compliance |
| 10. | Annual accounts | Scrutinizers Reports |
| 11. | Directors report | Minute book |
| 12. | Auditor’s report | Any other Records/documents which will have a permanent value for the company event after the expiry of the of legal preservations period |
| 13. | Disclosures under takeover code |  |
| 14. | Declaration by directors under section 164 of the Companies Act, 2013 |  |
| 15. | Declaration by directors under section 184 of the Companies Act, 2013 |  |

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| Sr. No. | Annexure A  (Records that need to be preserved for 8 years) | Annexure B  (Records that need to be preserved permanently) |
| 16. | All documents under the Listing Agreement |  |
| 17. | Notice of General Meetings and Board Meetings |  |
| 18. | Documents on which the common seal of the company has been affixed. |  |