



POLICY FOR PRESERVATION OF DOCUMENTS

The Company pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, (“LODR”) has adopted a Policy for preservation of documents, hereinafter called “the Policy”.

PURPOSE:

The Policy provides guidelines for systematic identification, categorization, retention and destruction of documents pertaining to the Company’s business.

The term ‘**Documents**’ in the Policy shall mean and include Statutory returns, records, correspondence, registers, contracts, agreements, memorandum of understanding, court orders, management approvals etc.,

CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

The documents have been grouped in the following categories for the purpose of preservation:

- Documents to be preserved permanently.
- Documents to be preserved for eight years after completion of the relevant transactions
- Documents to be preserved for more than 8 years but not permanent
- Other documents

A. DOCUMENTS TO BE PRESERVED PERMANENTLY

The following documents to be preserved permanently are classified department wise:

DEPARTMENT	S. NO	DOCUMENTS
SECRETARIAL DEPARTMENT	1.	Certificate of Incorporation and Certificate of Commencement of Business
	2.	Memorandum & Articles of Association, as amended from time to time
	3.	Minutes of the Shareholders meetings, Board meetings, Committees meetings, Creditors meetings and Class meetings
	4.	Registers relating to Directors & Key Managerial Personnel, Charges,

SECRETARIAL DEPARTMENT		Index of Members, Investments in Securities (not held in the name of the Company), Renewed and Duplicate Certificates, Contracts in which Directors are interested, Directors' Shareholdings, Inter Corporate Loans and Investments, Investments (other than securities not held in the name of the Company), Transfer/ Transmission of shares and Allotment of shares
	5.	Transfer Deeds / DRFs, Memorandum of Transfer / Transmission, DEMAT and documents relating to issue of securities, share transfer, transmission, split, consolidation, issue of share certificates, etc.,
	6.	Corporate Social Responsibility Records
	7.	Prospectus, Letters of Offer and other similar documents
	8.	All other documents as may be prescribed under the Companies Act, 2013 & 1956, SEBI Regulations or any other law relating to the Company for the time being force to be preserved permanently unless a shorter period is specifically mandated under such acts
LEGAL DEPARTMENT	9.	Agreements, if any, entered into with the Promoters or between/among the Promoters to which the Company is a Party.
	10.	All kinds of Agreements entered by the Company including Joint Venture, and all the related documents to these Agreements
	11.	Documents pertaining to Settlement/Out of Court Settlement of any litigation including the Orders/Awards passed by various Labour Court or any other Authorities
	12.	Court/ Arbitration Orders including Interim & Final Orders
FINANCE DEPARTMENT	13.	Signed Original Copies of Annual Accounts / Reports
	14.	All ledgers (including suppliers/customers) and Trial balance statements
	15.	Bank statements and Bank loan agreements
	16.	Standard Operating Procedures
	17.	Accounting and other operating manuals as amended from time to time
	18.	Costing records and Cost Audit reports
	19.	Information related to subsidy workings / claims
	20.	Details of fixed assets including year of commissioning

FINANCE DEPARTMENT	21.	Licenses/ Registration Certificates issued by various authorities relating to Income Tax, Sales Tax, Customs, Central Excise, Service Tax, Directorate of Industrial Safety, local bodies, Employees Provident Fund, Employees State Insurance, Safety and Environment, and any other statutory bodies.
	22.	All Tax returns (Excise, Service Tax, Customs, VAT, IT, etc) and Assessment Orders
ADMIN DEPARTMENT	23.	Documents relating to the land / Building and any other immovable properties owned by the Company including Building Plans / Blue prints etc.,
	24.	Documents relating to movable properties owned by the Company
HR DEPARTMENT	25.	Employee Retirement files relating to Gratuity, Superannuation, Address files and PF trust/ ESI Documents
	26.	Legal / Statutory documents relating to Charge Sheet and disciplinary action file
	27.	ESI/ EPF reimbursement file
	28.	Contract employees files namely their personal files, Contract labour management documents relating to RC file, Contractor Master, etc.,
	29.	Approved Standing Orders and Union Agreements like 12(3) Agreement with staff, SEU files and policy files
	30.	Employees Records namely personal file, performance assessment, promotion and increment files, etc.,
	31.	Payroll documents relating to Production Incentive files and finance advice records
TECHNICAL DEPARTMENT	32.	Time office documents
	33.	Shut Down Reports
	34.	Maintenance History of Motors and Transformers
	35.	Checklists for Mechanical Maintenance and Instrument Maintenance History
	36.	Statutory records like IBR, Radiography, Explosive and Correspondences (External)
	37.	Motor rewinding register

TECHNICAL DEPARTMENT	38.	Accident Register
	39.	Quarterly Report relating to Technical Data
	40.	All Equipment manuals and Drawings
	41.	Turn Around Report
	42.	Standard Operating Procedures

B. DOCUMENTS TO BE PRESERVED FOR EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:

The following documents shall be preserved for a period of eight years after completion of the relevant transactions are classified department wise:

DEPARTMENT	S. NO	DOCUMENTS
FINANCE DEPARTMENT	1.	All books of accounts and related records including vouchers
	2.	Import Documents
	3.	Insurance Policies, Claims and related documents
	4.	All pay roll related records like payslips, PF remittances, Form 16 issued etc.
	5.	All HR related statutory payments like Gratuity, Superannuation, Leave settlement etc.
	6.	Details of all inventory records like raw materials, intermediates, stores and spares and finished goods.
	7.	Internal Audit reports
SECRETARIAL DEPARTMENT	8.	Correspondence with shareholders, Change of address communications, Covering letters enclosing original share certificates, Scrutiniser's report and copies of notices of postal ballot, Notice of disclosure of interest by the Directors, Replies to show cause notices and Investor complaints details
	9.	Register of Allotment, Directors' Attendance, Dividend Registers / Bank registers, proxies and Inspection

ADMIN DEPARTMENT	10.	Documents relating to Prevention of Sexual Harassment act.
LEGAL DEPARTMENT	11.	Documents related to litigation / disputes or any pending investigation and orders passed by any regulatory body shall be preserved for a period of 8 years from the date of final disposal.
HR DEPARTMENT	12.	Trainee records relating to personal files etc.,
	13.	PF/EPS settlement files
	14.	Medi Claim Insurance
	15.	Salary Register Inputs and Staff head Count files
TECHNICAL DEPARTMENT	16.	All log books, Analysis reports, Registers, activity report prepared and maintained by the Technical Department are preserved as may be decided by the Head of the Technical Department.
IT DEPARTMENT	17.	IT Policies and Procedures
	18.	IT Asset list across all the locations
	19.	Vendor Documents like procurement order, service order etc.,
	20.	IT Service contracts
	21.	Websites and domain details documents
	22.	IT Organization process Chart

C. DOCUMENTS TO BE PRESERVED FOR MORE THAN 8 YEARS BUT NOT PERMANENT

The following documents shall be preserved for more than 8 years but not permanent are classified department wise:

DEPARTMENT	S. NO	DOCUMENTS
TECHNICAL DEPARTMENT	1.	Shift In Charge Log book
	2.	Monthly/Annual Reports relating to plant
	3.	Corrective & Preventive Action Report
	4.	Vibration Trend and SPM Reports of Equipments

TECHNICAL DEPARTMENT	5.	Material Receipt cum Inspection Reports – Imported and Indigenous
	6.	Marketing Samples / Analysis Register
	7.	Inspection Reports
	8.	Modification proposals
	9.	Customer Complaints
TECHNICAL DEPARTMENT	10.	Important plant parameters log sheet
	11.	Correspondences (internal)
	12.	Closed Purchase Orders (Imported)
IT DEPARTMENT	13.	Software license documents and other documents relating to IT Infrastructure, IT application and IT user manuals.

D. OTHER DOCUMENTS

1. All agreements / contracts / documents (other than those covered under (a), (b), and (c) above) shall be preserved for a minimum period of 3 years from the date of expiry or such period as may be determined by the Head of the Department concerned.
2. Notwithstanding the above, if any law / statute specifies a longer or shorter period of preservation of documents, such period of preservation shall apply.

E. E- MAILS / ELECTRONIC DOCUMENTS :

All e-mails / documents in electronic form are preserved on daily/weekly/monthly basis by IT department and can be retrieved if required on request to IT Department.

Individual employees have the option to retain their e-mails / documents in electronic form depending on their need.

F. MODE OF PRESERVATION :

Documents such as Certificate of Incorporation, Registration Certificate issued by Sales Tax, Customs, Central Excise, Share transfer documents etc., shall be preserved in original wherever required if available and in other cases scanned / certified copies / photo copies, as may be considered adequate.



G. GENERAL

- a. For destruction of documents maintained by the Company, prior approval of the Whole-time Director shall be obtained in writing with the recommendation of the HOD. The manner of disposal or destruction shall also be specified in such approval.
- b. The Company shall maintain a register containing the particulars of documents destroyed, date & mode of destruction and such entries shall be authenticated by the HODs concerned and the register of destruction of records shall be preserved permanently.
- c. The HODs concerned shall be responsible for preservation of the documents as stated above. Where more than one department is involved, the custody of the original documents, if any shall be decided mutually. In any case, copies of the same shall be maintained by all concerned or as the case may be.
- d. In case of any issues relating to interpretation of the Policy, the same shall be referred to the Whole-time Director for final decision.

POLICY APPROVAL / REVIEW

The Policy has been duly approved by the Board of Directors. It shall be subject to review from time to time to comply with any regulatory amendments or statutory modifications thereof , subject however to the approval of the Board of Directors.
