

# Policy on Preservation of Documents and Archival

## Background:

Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “Regulations”), requires every listed entity to frame a policy for preservation of documents and Regulation 30(8) requires every listed entity to disclose on its website all such events or information disclosed to the stock exchange(s) pursuant to Regulation 30 on the website of the listed entity for a minimum period of 5 years and thereafter as per the archival policy of the listed entity.

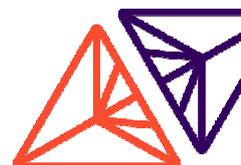
## Policy:

Pursuant thereto, this policy provides for:

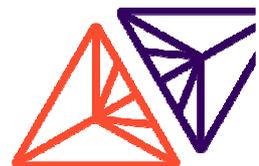
1. Preservation of documents: Documents which shall be permanent in nature or documents with preservation period of not less than 8 years after completion of the relevant transactions to which such document relates. The documents may be preserved in physical and / or electronic form as permitted by the respective legislations.
2. Archival: Events or information made to the stock exchange(s) and displayed in the Company’s website under Regulation 30 in the Company’s website shall be maintained for a minimum period of 5 years from the date of such disclosure and thereafter it shall be archived and kept for a minimum period of 3 years.
3. Criteria for preservation of documents:
  - i. Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws / is not covered under this policy shall be preserved for a minimum period of 3 years.
  - ii. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.
4. Preservation of Documents / Records:

Subject to clause 3 above, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention, as well as any other pertinent factors as the overseeing authorities deem fit.

- a. Financial Statements, Minutes, Statutory Registers & other Documents: (a) Financial Statements including documents concerning payroll, expenses, vouchers, proof of deductions, business costs, accounting procedures and other documents concerning the Company’s revenues and expenses including capital expenditure, Audit Reports; (b) Minutes of Meetings of Board, Members and other Committees along with statutory registers as prescribed under governing laws for time being in force shall be preserved for such period as provided in respective laws. Any document where preservation period is not prescribed under governing laws shall be preserved for a minimum period of 8 years.



- b. Press Releases / Public Filings: The Company should retain copies of all press releases and documents filed with Stock Exchanges, Registrar of Companies and other regulatory authorities on a permanent basis. All events and press releases filed with the stock exchanges that are required to be displayed and maintained in the Company's website shall be kept in the website for a minimum period of 5 years and thereafter archived and kept for a minimum period of 3 years.
- c. Tax Records: Tax records including the documents relevant to respective assessments and filings should be retained for at least 8 years from the date of completion of assessment or such period till the time assessment reaches finality or such time as prescribed under respective tax laws, whichever is later.
- d. Employment Records / Personnel Records: Labour laws require the Company to maintain certain recruitment, employment and personnel information. The Company should also maintain personnel files that reflect performance reviews if any and any complaints brought against the Company or individual employees under applicable labour laws. The Company should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file.
- Employment and Personnel Records need to be maintained as long as the concerned individual remains an employee of the Company and for a further period of 8 years from the date of cessation of employment or such period of time as prescribed under respective laws for time being in force, whichever is later.
  - Returns under various labour laws, governmental and statutory filings, etc. need to be retained in accordance with the related statute as may be specified therein or for a minimum period of 8 years whichever is later.
- e. Legal Files / documents: All legal documents / copies of notices / summons / orders / judgments and all other legal documents shall be preserved permanently.
- f. Development / Intellectual Property and Trade Secrets: Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to the Company and are protected as a trade secret where the Company:
- i. Derives independent economic value from the secrecy of the information; and
  - ii. The Company has taken affirmative steps to keep the information confidential.
- The Company should keep all documents designated as containing trade secret information for at least the life of the trade secret.
- g. Contracts: Final, executed documents of all contracts entered into by the Company should be retained for at least 3 years following the expiry or termination of such contracts, and for a longer period if required..
- h. Judicial Orders: Judicial Orders shall be preserved permanently.
- i. Disputes: In case any documents are subject to dispute, then, such documents shall be preserved permanently.
- j. E-mail: E-mails of Band L3 and above will be preserved for a minimum period of 1 year after the person exits and thereafter for a further period on need basis. E-mails of Band L1 and Band L2 will be preserved based on need basis. E-mails shall be stored in the form of any tangible electronic medium.





- k. Completed Projects: Data pertaining to completed projects are preserved in any tangible electronic medium for a minimum period of 1 year after completion of the project, and thereafter they are to be archived / stored for 5 years unless specified by customer / function / site concerned, as per Corporate IT Policy / Quality Records Management Process of the Company. The hard copies are preserved by the project / function concerned for such period based on its importance / requirements.
  - l. All project data, Quality process / policy documents, ERP database, system configuration details of servers, back-ups taken at regular intervals, etc. shall be preserved as per Corporate IT Policy / Quality Records Management Process of the Company.
5. Custody of Documents: All documents shall be under the custody of respective Head of the Departments. The respective Head of the Departments shall also be bound to preserve the documents in accordance with this policy.
  6. Archival & Destruction of Documents post preservation timelines: After the documents (being physical / electronic documents) are preserved for the stipulated period as mentioned, the same shall be archived in physical and / or any tangible electronic medium and thereafter be destroyed in such manner as mentioned under any of the laws / as may be decided by the respective Head of the Department. The respective Head of the Department shall maintain a register of all such documents being destroyed and produce such register to the Compliance Officer of the Company when called upon.

When e-mails and documents are preserved in tangible electronic medium, the same shall be capable of easy and timely retrieval.

In the event of major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

The Chairman is authorized to make appropriate changes to the policy as he may deem expedient taking into account the law and Regulations for the time being in force.

