

Policy

This Policy represents the Company's policy regarding the retention and disposal of records including electronic documents. This Policy was approved by the Board of Directors of the Company in their meeting held on 30th day of October, 2015 effective from 1st December 2015.

Purpose

The purpose of this Policy is to ensure that necessary records and documents of the Company are adequately protected and maintained and to ensure that records that are no longer needed by the Company or are of no value are discarded/shredded at the proper time. This policy aims at meeting the requirements of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining electronic documents - including e-mail, web files, social media, text files, sound and movie files, PDF documents, and all Microsoft Office or other formatted files.

Administration

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records and electronic documents of the Company. The Head – Legal & Secretarial is the officer in charge of the administration of this Policy (the "Administrator") and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed.

The Administrator is also authorized to:

- Make modifications to the Record Retention Schedule from time to time to ensure that it is in compliance with the listing agreements with stock exchanges, local, state and central laws and includes the appropriate document and record categories for the Company;
- Monitor local, state and central laws affecting record retention;
- Advise on the methods of disposal of the records;
- Annually review the record retention and disposal program;
- Monitor compliance with this Policy.

Applicability

This Policy applies to all physical records generated in the course of the Company's operation, including both original documents and reproductions. It also applies to the electronic documents described above. The policy applies to all employees of the Company.

This is electronic approved documents, Hence physical signature not required

APPENDIX A - RECORD RETENTION SCHEDULE

The Record Retention Schedule is organized as follows:

Type of Document	Retention period	Format for preservation of Records
Accounts payable ledgers and schedules	10 years	Soft and/or Hard Copy
Audit Reports	Permanent	Soft and/or Hard Copy
Bank Reconciliations	8 years	Soft and/or Hard Copy
Bank statements/transactions	8 years	Soft and/or Hard Copy
Bank Guarantees	Permanent	Hard Copy
Depreciation Schedules	Permanent	Soft and/or Hard Copy
Financial Statements (Year End)	Permanent	Soft and/or Hard Copy
Contracts and leases (expired)	10 Years	Hard Copy
Corporate Guarantees	Permanent	Hard Copy
Correspondence (general)	5 years	Soft and/or Hard Copy
Correspondence (legal and important matters)	Permanent	Soft and/or Hard Copy
Correspondence (with customers and vendors)	5 Years	Soft and/or Hard Copy
Correspondence (with Government Authorities)	Permanent	Soft and/or Hard Copy
Certifications (ISO etc)	Permanent	Hard Copy
Designs & Design Documents and other R&D records	Permanent	Soft and/or Hard Copy
Dividend records	Permanent	Soft Copy
Employment related documents	Permanent	Soft and/or Hard Copy
Indemnity Bonds (from expiry)	5 Years	Hard Copy
Insurance Policies	Permanent	Hard Copy
Insurance records, current accident reports, claims, policies, and the like	Permanent	Soft and/or Hard Copy
Internal audit documents	Permanent	Soft and/or Hard Copy
Purchase Orders and Invoices (to customers, from vendors)	8 years	Soft and/or Hard Copy
Minute books, bylaws and charter	Permanent	Soft and/or Hard Copy
Attendance Register of Board Meeting and Committee	8 Years	Hard Copy

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Meeting		
Logistics records	5 years	Soft and/or Hard Copy
Payroll records and summaries	8 years	Soft and/or Hard Copy
Personnel files	Permanent	Hard Copy
Production and Operations records	5 years	Soft and/or Hard Copy
Quality records	Permanent	Soft and/or Hard Copy
Retirement & Resignation records	Permanent	Soft and/or Hard Copy
Shareholder records	Permanent	Soft and/or Hard Copy
Tax returns and worksheets	10 years	Soft and/or Hard Copy
Trademark registrations, Patents and copyrights	Permanent	Soft and/or Hard Copy
Income tax records	10 years	Soft and/or Hard Copy
Income tax (cases)	permanent	Hard Copy
Central Excise & VAT records	6 years	Soft and/or Hard Copy
Central Excise & VAT (cases)	Permanent	Hard Copy
Customs records	7 years	Soft and/or Hard Copy
Customs (cases)	Permanent	Hard Copy
Service Tax records	5 years	Soft and/or Hard Copy
Service Tax cases	permanent	Hard Copy
Forex Transaction Records	8 years	Soft and/or Hard Copy
Disclosures made to Stock Exchanges	5 years	Soft and/or Hard Copy
Disclosures made to Stock Exchanges displayed on the Website	5 years	Soft and/or Hard Copy
Investor Relations Documents in the Website	8 years	Soft and/or Hard Copy
Every message sent through Email or any such service.	90 days	Soft copy