



INVESTMENT & PRECISION CASTINGS LTD

You Design, We Cast

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Certified Company

INVESTMENT & PRECISION CASTING LIMITED POLICY ON PRESERVATION OF THE DOCUMENTS

Base Document

:

Regulation 9 of the Securities Exchange Board of
India (Listing Obligations and Disclosure
Requirements) Regulations, 2015 (“Regulations”)

Contents

Scope

A policy on preservation of Documents (defined below) would ensure safekeeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Regulations”), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

• Definitions –

- “**Act**” means the Companies Act, 2013.
- “**Applicable Law**” means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.
- “**Authorised Person**” means any person duly authorised by the Board.
- “**Board**” means the Board of directors of the Company or its Committee.
- “**Company**” means INVESTMENT & PRECISION CASTING LIMITED.
- “**Current Document(s)**” means any Document, that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
- “**Document(s)**” refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

- **“Electronic Record(s)”** means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
- **“Regulations”** means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

- **Coverage**

This Policy is intended to guide the Company and its officers on maintenance of any Documents, their preservation and disposal.

- **Classification**

The preservation of Documents shall be done in the following manner:

- Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.
- Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is “Current”.
- In case of any other Document, for such period, as a competent officer of the Company required to handle or deal with the Document takes a considered view about its relevance; Provided that generally speaking, a Document may be preserved for a period of 5 years from the date on which the Document was originated.
- An indicative list of the Documents and the timeframe of their preservation is provided in **ANNEXURE I.**

- **Modes of preservation**

- The Documents may be preserved in
 - physical form or
 - Electronic Form.
- The officer of the Company required to preserve the Document shall be Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law
- The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

- The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

- **Custody of the Documents**

- Subject to the Applicable Law, the custody of the Documents shall be with the Authorised Person. Where the Authorised Person tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant

Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

- **Authority for approval of Policy**

The Board shall have the authority for approval of this policy in pursuance to the Regulations. This authority has been granted *via* the Regulations.

- **Authority to make alterations to the Policy**

The Board is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

- **Destruction of Documents**

- Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for shortterm use only. This applies to both Physical and Electronic Documents.
- The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practice are listed in **ANNEXURE II**.
- A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.
- The entries in the register shall be authenticated by the Authorised Person.
- The format of the register has to be in accordance with **AnnexureIII**.

- **Conversion of the form in which the Documents are preserved**

- The physical Documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
- This will be done after obtaining prior approval of the Board.

- **Authenticity**

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

- **Interpretation**

In any circumstance where the terms of this policy differ from any existing or newly enacted law, rule, Regulation or standard governing the Company, the law, rule, Regulation or standard will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rule, Regulation or standard.

ANNEXURE A

SI No.	Record Category	Record Type	Minimum Preservation Requirement
1	Board Meeting & Committee Meeting records	<ul style="list-style-type: none"> • Board Minutes • Committee Minutes 	Permanent
		<ul style="list-style-type: none"> • Agenda • Internal Audit Reports • Board Resolutions • Committee Resolutions • Adopted Policies/ Codes etc. • Attendance Registers • Disclosure of Interest • Other Miscellaneous reports/ records 	8 financial Years following the relevant financial year
2	General Meeting records	<ul style="list-style-type: none"> • Register & Index of members • Minutes 	Permanent
		<ol style="list-style-type: none"> 1. Notices and Explanatory Statement 2. Attendance Register 3. Scrutinizers Report 	8 Financial Years from end of relevant financial year

3	Other Secretarial Records	<ul style="list-style-type: none"> • Incorporation / Conversion/ Business commencement Certificates. • Memorandum of Association & Articles of Association. • Common Seal • Annual Reports. • Various Statutory Registers pursuant to the Companies Act, 1956 and/or Companies Act, 2013. • Share Transfer, transmission etc. correspondences with the Registrar & Share Transfer Agent. • Correspondences with Statutory bodies. 	Permanent
		1. Non-statutory Registers under the Companies Act, 1956 and/or Companies Act, 2013.	8 years from the Financial Year in which the latest entry is made.
		1. Correspondences with the shareholders.	8 years from the date the complaint is resolved.
		1. Copies of all annual returns alongwith certificates & documents required to be annexed thereto.	8 years from the date of filing with the Registrar.
4	Insurance records	<ul style="list-style-type: none"> • Insurance Policy Execution/Renewal Certificate • Insurance Claims under various Policies 	5 years from lapse of the Policy/ settlement of claim.
5	Contracts/Agreements/Purchase Orders/	1. Renewal. <ul style="list-style-type: none"> • Modification • Termination of : Contracts/ Agreements/ Purchase Order 	5 years from termination of Contract/Agreement/ completion of purchase.
6	SEBI & Stock Exchange Records	<ul style="list-style-type: none"> • Correspondences with Statutory bodies. • Quarterly/Annual/ Non-Quarterly/others Compliances submitted from time to time. • Listing Agreement/Listing Regulations • Disclosure in Newspapers 	8 years from the end of relevant financial year
7	Property Records	<ul style="list-style-type: none"> • Agreements/ Contracts • Documents relating to acquisition and sale of Real Property. 	8 years from the end of relevant financial year
8	Legal	Correspondence with Courts/ other statutory bodies regarding any petition/ case/suit etc.	8 years from the end of relevant financial year
9	Personnel Records	1. Official Personnel Files of Active Employees	To be retained during active employment
		1. Official Personnel Files of inactive Employees	8 years from the date of termination of employment.

10	Labour Law records	<ul style="list-style-type: none"> • Registration/ Renewal Certificate under various Acts relating to Labour laws. • Maintenance of various Registers under the various acts in force read with the Rules made thereunder, relating to Labour laws. 	Permanent
11	Finance	<ul style="list-style-type: none"> • Audited Financial Statements • Auditors Reports 	Permanent
		Books of Accounts & Vouchers	8 financial years following the relevant Financial Year.
12	Taxation	<ul style="list-style-type: none"> • Registration/Amendment Certificate under various relevant provisions in force. • Correspondences with the statutory bodies 	Permanent
		Preservation of specific books of accounts	8 financial years following the relevant Financial Year.
		Records pertaining to various other laws in force	Records maintained under various other laws in force from time to time would be acceptable.

ANNEXURE II

The following categories of Documents may be destroyed as normal administrative practice:

- catalogues;
- copies of press cuttings, press statements or publicity material;
- letters of appreciation or sympathy, or anonymous letters;
- requests for copies of maps, plans, charts, advertising material (subject to Clause 9 and 10 of this Policy);
- facsimiles where a photocopy has been made;
- telephone message;
- drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 9 and 10 of this Policy); and
- routine statistical and progress reports compiled and duplicated in other reports(subject to Clause 9 and 10 of this Policy)

ANNEXURE III

- The format of the register of Documents disposed/destroyed –

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF APPLICABLE LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON