

# Policy for Preservation of Documents

## INTRODUCTION

In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**Listing Regulations**"), the Board of Directors (the "**Board**") have adopted this Policy for Preservation of Documents, as required under applicable regulations.

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 this Policy and procedures until such time as this Policy is changed to conform to the law, rule, regulation or standard.

## OBJECTIVES

To determine preservation period for records/documents based on their reference value and legal requirements. The following aspects are considered while arriving at the preservation period:

- Company's own information retrieval needs
- Statutory requirements under respective statutes.
- To ensure easy retrieval.
- To ensure that unwanted records do not occupy storage space.

## DEFINITION

In this policy unless the context otherwise requires

- a. "**Act**" means the Companies Act, 2013 and rules made there under, as amended from time to time
- b. "**SEBI Regulations**" shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time
- c. "**Company**" means MAINI PRECISION PRODUCTS LIMITED.
- d. "**Document**" includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

- e. **“Key Managerial Personnel”** or **“KMP”** shall have the same meaning ascribed to it under the Act.
- f. **“Board”** or **“Board of Directors”** shall mean the Board of Directors of MAINI PRECISION PRODUCTS LIMITED.
- g. **“Financial Year”** shall have the same meaning ascribed to it under the Act.
- h. **“Electronic Form”** with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.

### **SCOPE**

Corporate records are all paper or electronic records that are produced by you as an employee, including but not limited to, memoranda, contracts, e-mails, time sheets, effort estimates and expense records.

### **RESPONSIBILITY**

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department subjected to permission of Senior Management/ Managing Director/Chief Financial Officer/Whole time Director.

### **PRESERVATION PERIOD**

The preservation period starts with the conclusion of financial year, in which the document has been formed or the last entry was made; the preservation period of agreements starts with the end of the financial year in which the agreement period expires.

For determining the preservation period, the records are categorized into following two categories:

<b>Category &amp; Description</b>	<b>Period of Preservation</b>
Records/documents with short reference value - i.e. Records, which are to be preserved for a short period for enquiry, evidence, verification, evaluation, etc.	Minimum period of 8 years
Records which will have a permanent value for the Company even after the expiry of legal preservation period.	Permanent

Notwithstanding the general guidelines, 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, industrial disputes, etc. are preserved according to specific needs 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.

#### **PRESERVATION LOCATION**

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.

#### **MODE OF PRESERVATION**

Records/documents may be preserved either physically or in electronic form.

## **DESTRUCTION OF RECORDS**

The records/documents preserved shall be reviewed every year by the respective department and action will be taken to destroy those records which are due for disposal with the prior approval of Management.

## **GENERAL AUTHORISATION**

The Policy shall be reviewed on a periodic basis and Managing Director and Chief Financial Officer are authorized jointly to make such changes as may be deemed necessary or as warranted by law.

## **Classification of Documents to be kept Permanent and Eight (8) years**

### **Corporate Records**

The Corporate documents (other than statutory records) are papers or electronic records including but not limited to contracts, e-mails, etc. of various functions of the Company. The Company is required to keep all Corporate Records of the Company for a period of 8 years, unless the same are required to be retained for a longer period for litigation or under other statutory requirement.

### **Filings with Stock Exchanges:**

All press releases and filings with stock exchanges shall be maintained for a period of eight years from the date of release/filing. All events and press releases filed with the stock exchanges shall be maintained for not less than five (5) years on the website of the company and thereafter in the archives of the Company for a period of three (3) years.

### **Statutory and other Records**

- a) **Minutes and Board related documents:** Minutes of meetings of the Board of Directors, Committees and shareholders shall be maintained in perpetuity. A copy of all materials provided to the Board of Directors or Committees of the Board shall be maintained for a period of 8 years.

- b) **Statutory Registers and other documents pursuant to Companies Act:** The Statutory Registers, filings with Registrar of Companies and other documents as required under the Companies Act 2013 shall be retained as per the requirement of the Act.
  
- c) **Books of Accounts and Tax Records:** Books of accounts and Tax records should be retained for at least eight (8) years following the completion of the relevant transactions or assessment year for which the records were last used or as per the requirement of the relevant statute.
  
- d) **Employment Records:** The Company maintains personnel records that include recruitment, employment, revision and personal information. These records should be retained for a period of one (1) year following the expiry or termination of employment. The employment records, which are statutory in nature shall be maintained as required under the relevant statute.
  
- e) **Intellectual Property Records:** Documents relating to the development and protection of intellectual property rights should be maintained for the life of such intellectual property right.
  
- f) **Contracts:** Execution copies of all contracts entered into by the Company should be retained for at least eight (8) year following the expiry or termination of the contracts.
  
- g) **Judicial Orders:** Judicial orders shall be preserved permanently.
  
- h) **Other Statutory records:** The other statutory records as required under various statutes shall be retained as per the requirement under the relevant statute.

In the event of major incident, the first priority is the safety of the people, followed by immediate action to recue 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.