

LUMAX INDUSTRIES LIMITED

POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS

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1. **Purpose**

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical. This policy seeks to ensure that the Company's business is adequately documented that are then managed in accordance with best practice.

2. **Regulatory Framework**

Chapter III of these SEBI Regulations, titled "Common Obligations of Listed Entities" enumerates the general obligations of compliance which every listed entity has to abide by.

Thus, Regulation 9 of the aforesaid Chapter enumerates on Preservation of the Documents approved by its Board of Directors, either in Physical or Electronic form.

3. **Scope**

3.1 The Securities and Exchange Board of India has on September 2, 2015 notified the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Regulations") which have come into effect on December 1, 2015.

3.2 Regulation 9 of the SEBI Regulations requires listed entities to have a Policy on Preservation of Documents approved by its Board of Directors, classifying the documents in at-least two categories, which are as follows:

- a. Documents whose preservation shall be permanent in nature; and
- b. Documents with preservation period of not less than eight years after completion of the relevant transactions.
- c. any other Document, for such period, as may deem fit by the authorized person.

3.3. Accordingly, this policy is framed as per the requirements of the SEBI Regulations. The policy is applicable to all departments of the Company. The preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability. The policy would ensure safekeeping, confidentiality of the records and safeguard the documents from getting manhandled. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/ destruction of the documents.

4. **Policy**

4.1 **Preservation:**

- a. The Company shall preserve all its records as per the requirements and provisions of the Companies Act, 2013 and the Rules made thereunder, the Secretarial Standards, and the SEBI Regulations and any all other applicable law, rules, regulations, internal policies of the Company, in force.
- b. All the documents and records stated in **Annexure A** to this policy shall be preserved permanently by the Company
- c. All the documents and records stated in **Annexure B** to this policy shall be preserved for not less than 8 years or such other longer period as may be prescribed under applicable laws/ rules/ regulations for the time being in force and thereafter the records can be destroyed.
- d. The Company shall adhere to the applicable provisions of law/ rules/ regulations with regard to the manner of maintenance of records.

4.2 **Archival**

- a. The document and records which are no longer current, but which are required to be preserved for a specified period of time or permanently under the applicable laws/ rules/ regulations shall be archived by the Company.
- b. Every Function/Unit shall identify the documents and records required to be maintained and preserved and shall be responsible for archiving the same as per this policy.
- c. Every Function/Unit shall follow the established procedure of archiving of documents and records and ensure ease of retrieval of such documents and records.
- d. The documents and records archived in electronic form shall be subjected to automatic back-up on a periodic basis as per the procedure established by the IT function of the Company.

5. **Modes of preservation**

The Documents may be preserved in Physical or Electronic mode.

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 prohibition of unauthorized access.

6. **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.

7. **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. The Company Secretary, being the Compliance officer is also authorized to make amendments in the policy, in case of any statutory changes necessitating such amendment.

8. **Destruction of Documents**

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both Physical and Electronic Documents.

The document shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after exercising due diligence while destroying any documents including seeking confirmation from other relevant departments or any authority as required under the Applicable Law pursuant to which the Documents have been preserved.

(In case any Company records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), or in exceptional cases i.e. if the record has certain special features or such a course is warranted by the peculiar needs of the department then such records shall be preserved until it is determined the records are no longer needed.)

9. Conversion of the form in which the Documents are preserved

The Physical Documents preserved may be converted, whenever required or felt necessary by the authorized person, into Electronic form to ensure ease in maintenance of records and efficient utilization of space.

10. General

10.1 The policy would be subject to revision/ amendment in accordance with the applicable laws.

10.2 The Company reserves its rights to alter, modify, add, delete or amend any of the provisions of this policy.

10.3 In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.
