

POLYCAB

POLYCAB INDIA LIMITED

POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS

<i>Particulars</i>	<i>Date</i>	<i>Version</i>
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POLICY ON PRESERVATION & ARCHIVAL OF DOCUMENTS

1. Background

This Policy has been formulated in accordance with the Regulation 9 read with Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. Objective

The objective of this Policy is to ensure that all the necessary data, information, documents and records of the Company, whether paper based or electronic based, are adequately protected and preserved as per the statutory requirements and as defined here under. This Policy facilitates the employees in handling the documents efficiently either in physical form or in electronic form. It also covers the various aspects on preservation of the documents, their archival and safe disposal/destruction.

3. Definition

- i. **“Company”** means Polycab India Limited.
- ii. **“Board”** means the board of directors of the Company or its Committee;
- iii. **“Documents”** means as defined in sub-section 36 of Section 2 of the Companies Act, 2013
- iv. **“Electronic Records”** means as defined in Information Technology Act, 2000 or as amended from time
- v. **“Listing Regulations”** means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015
“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed
- vi. **“Policy”** means this Policy of Preservation of Documents of the Company;
- vii. **“Records”** in relation to this policy includes accounting records, books or papers and books and papers as defined in sub-section 12 of section 2, books of accounts as defined in sub-section 13 of section 2 of the Companies Act, 2013, statutory and other documents of material significance whether covered under this Policy or not.
- viii. **“Authorised Person”** means the functional head of the concerned department or any other person duly authorised by the Board or the Managing Director or the Whole Time Director of the Company.

4. **Classification for Preservation of Documents**

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

Class A Documents: Documents which are to be preserved permanently, either under Applicable Law. An indicative list of Class A Document has been set out at Annexure I.

Class B Documents: Document which are required to be preserved for not less than eight years after the completion of the relevant transactions. An indicative list of Class B Document has been set out at Annexure II.

5. **Roles and Responsibilities**

This policy is applicable to all departments and units of the Company. Each employee shall abide by the Policy. The Authorised Person shall guide the employees and ensure that they identify and classify documents and take appropriate action with regard to their preservation in accordance with this Policy. The Authorised Person shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

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 Disc, other storage devices or such other Documents and devices in his possession and such authorised person taking possession of documents needs to change the password.

7. **Destruction of Documents:**

After the expiry of the retention period, the preserved documents as classified above may be shredded or destroyed in such mode under any instructions approved by the Authorised Person. However for secrecy, the Authorised Person should ensure that no preserved document in physical mode, after the retention period, be sold out in the market or reused. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

Where there is no such requirement of the statutory retention period, the documents may be retained for such period and then destroyed, as deemed fit by the Authorised Person.

In the event the Company is served with any Notice for documents from any of the statutory authorities or any litigation is commenced by or against the Company, then the destruction of documents which are subject matter of notice / litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Authorised Person shall immediately inform all concerned employees of the Company for suspension of further destruction of documents.

8. Register of documents destroyed:

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 been set out at Annexure III.

9. Dissemination of this Policy:

The adoption of this Policy by the Board of Directors of the Company and shall be hosted on the website of the Company.

10. Archiving of Documents which are hosted on the Company's website:

The Company is required to disseminate and host the information and documents on its website under various provisions of the Listing Regulations, Companies Act, 2013 and other applicable laws.

The Company will adopt the following policy for archival of the disclosures made on the website for information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations:

Archival Process

- i. All the relevant disclosures of information and events communicated to the stock exchanges under Regulation 30 of the Listing Regulations will be hosted on the website of the Company under the section entitled "Investor Relations" for a period of five years and thereafter it will be shifted to the section entitled "Archives" hosted on the website of the Company.
- ii. The disclosures of information and events communicated to the stock exchanges will be retained on the website of the Company in the section entitled "Archives" for a minimum period of two years. Such disclosures which have been shifted to the section entitled "Archives" hosted on the website of the Company may be archived from the website of the Company after completion of the two years, commencing after completion of the five year period as prescribed under the Listing Regulations. Subsequently, anyone intending to review archived information and events communicated to the stock exchanges may write to the Company Secretary and Compliance Officer of the Company.
- iii. This policy will be periodically reviewed and amended based on any changes in the laws, rules and regulations applicable to the Company from time to time or changes in internal processes.
- iv. The disclosure of information and documents to be placed on the Company's website and thereafter in Archives has been set out as Annexure IV
- v. Adoption of this policy shall be communicated to the Stock Exchange(s) where the Company's equity shares are listed.

Annexure I

Documents whose preservation shall be permanent in nature

S.No.	Nature of Documents
1	Registration Certificates
2	Licenses & Statutory Approvals
3	Statutory Registers required under applicable laws
4	Audited financial statements
5	Minutes of General Meeting
6	Minutes of Board Meeting
7	Minutes of various Committee Meetings
8	Material Agreements/Contracts
9	Orders issued by Courts/Statutory bodies
10	Investment Documents/proofs including certificates etc.
11	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time

Annexure – II

Documents with preservation period of not less than eight years after completion of the relevant transactions

S.No.	Nature of Document(s)
1	Books of Account together with relevant vouchers (Not less than 8 financial year)
2	Instrument Creating a Charge or modification thereon(8 years from the date of satisfaction of charge)
3	Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities)(MGT-2)
4	Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar
5	All notices pertaining to disclosure of interest of directors(MBP-1)for a period of 8 years from the end of the financial year to which it relates
6	All notices pertaining to disclosure of interest of directors(MBP-1)for a period of 8 years from the end of the financial year to which it relates
7	All certificates surrendered to a company (3 years from date of surrender)
8	Register of deposits (not less than 8 years from the date of last entry)
9	The postal ballot and all other papers relating to postal ballot including voting by electronic means, (as long as they remain current or for 8 financial years), whichever is later
10	All books and documents relating to the issue of share certificates, including the blank forms of share certificates not less than 30 years
11	Attendance Register for Board Meeting and recording of attendance of Meetings through Electronic Mode (8 Financial years)(SS-1)
12	Copies of Notices, Agenda, Notes on Agenda and papers related to Board Meeting. (8 Financial Years) (SS-1)
13	Office copies of Notices, scrutiniser's report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS-2)
14	Personnel Documents
15	Insurance Policies under various Policies
16	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time

Annexure – III

The format of the register of Documents disposed / destroyed

Particulars of Document	Date of Destruction	Mode of Destruction	Initials of the Authorised Person

Annexure – IV

Time period for disclosure of information and documents on Company's website and thereafter in Archives

Sl. No.	Nature of information / document	To be hosted on the website	In Archives
1.	Details of its business	Permanently, to be updated from time to time.	-
2.	Terms and conditions of appointment of independent director(s)	Up to tenure of the Independent director	To be kept in Archives for 3 years
3.	Composition of various committees of board of directors	Permanently, to be updated from time to time.	-
4.	Code of conduct of board of directors and senior management personnel	Permanently, to be updated from time to time.	-
5.	Details of establishment of vigil mechanism/ Whistle Blower policy	Permanently, to be updated from time to time.	-
6.	Policy on dealing with related party transactions	Permanently, to be updated from time to time.	-
7.	Policy for determining 'material' subsidiaries	Permanently, to be updated from time to time, as and when applicable	-
8.	Details of familiarization programmes imparted to independent directors including the		
	(i) number of programmes attended by independent directors (during the year and on a cumulative basis till date),	5 years	To be kept in Archive for 3 years
	(ii) number of hours spent by independent directors in such programmes (during the year and on cumulative basis till	5 years	To be kept in Archive for 3 years
	(iii) other relevant details	5 years	To be kept in Archive for 3 years
9.	The email address for grievance redressal and other relevant details	Permanently, to be updated from time to time.	-
10.	Contact information of the	Permanently, to be updated from time to time.	-

	designated officials of the listed entity who are responsible for assisting and handling investor		
11.	Financial information including:		
	(i) notice of meeting of the board of directors where financial results shall be discussed	1 year	To be kept in Archive for 1 year
	(ii) financial results, on conclusion of the meeting of the board of directors where the financial results were approved	5 years	To be kept in Archive for 1 year
	(iii) complete copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report etc.	5 years	To be kept in Archive for 3 years.
12.	Shareholding pattern	3 years	To be kept in Archive for 3 years.
13.	Details of agreements entered into with the media companies and/or their associates, etc.	For life time of the agreement	To be kept in Archives for 1 year
14.	Schedule of analyst or institutional investor meet and presentations made by the listed entity to analysts or institutional investors simultaneously with submission to stock exchange	1 year	To be kept in Archives for 1 year
15.	New name and the old name of the listed entity for a continuous period of one year, from the date of the last name change	1 year	To be kept in Archives for 1 year
16.	Copies of advertisements published in Newspapers:	1 year	To be kept in Archives for 1 year
	(a) notice of meeting of the board of directors where financial results shall be discussed	1 year	To be kept in Archives for 1 year
	(b) financial results, as specified in regulation 33, along-with the modified opinion(s) or reservation(s), if any, expressed by the auditor.	1 year	To be kept in Archives for 1 year
	(c) statements of deviation(s) or variation(s) as specified in sub regulation (1) of regulation 32 on quarterly basis, after review by audit committee and its explanation in directors report in annual report	1 year	To be kept in Archives for 1 year
	(d) notices given to shareholders by advertisement.	1 year	To be kept in Archives for 1 year

17.	Disclosures made on the website of all such events or information which has been disclosed to the stock exchanges under Regulation 30 of the Listing Regulations.	5 years	To be kept in Archives for 1 year
18.	Other information or documents as may be prescribed / amended under applicable Laws or by Authorised person	Permanent or for such time period as may be prescribed there under	To be kept in Archives for 1 year