

NURECA LIMITED
CIN: L24304MH2016PLC320868

PRESERVATION OF DOCUMENTS POLICY

1. Preface

The policy on Preservation of Documents (defined below) would ensure safe keeping of the records and safeguard the documents from getting mishandled, while at the same time avoiding overflowing of inventory of documents. The Board of Company have formulated this Policy ("The Policy") for preservation of Documents / Records maintained by the Company either in Physical Mode or Electronic Mode. This Policy has been formulated in pursuance with the Regulation 9 of the SEBI LODR Regulations.

2. Definitions

- a. **"Act"** means the Companies Act, 2013.
- b. **"Applicable Law"** means any existing or new enactments, circulars, Laws, Rules, Regulations issued by the Government of India/ State Governments or laws enacted by any overseas country which has an impact on the Company's businesses and also rules, regulations or standards which are issued by any statutory bodies in India and governing the Company.
- c. **"Authorised Person"** means any person duly authorised by the Board.
- d. **"Board"** means the Board of directors of the Company or any of the Committees constituted by it.
- e. **"Company"** means NURECA LIMITED.
- f. **"Current Documents"** means any Document that still has an ongoing relevance without limitation or reference to any ongoing litigation, proceedings, complaint, dispute, contract or the like matter.
- g. **"Documents/ Records"** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, minutes, indices, registers and or 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.
- h. **"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 or access thereto.
- i. **"Electronic Records"** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.
- j. **"Maintenance"** means keeping Documents, either physically or in electronic Form.

- k. **"Preservation"** means to keep in good order and to prevent from being altered, damaged or destroyed.
- l. **"SEBI LODR Regulations"** means the Securities and Exchange Board of India (Listing Obligations 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.

3. **Purpose of the Policy**

The purpose of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value, are discarded after following the due process for discarding the same. Another purpose of this policy is aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

4. **Administration**

Attached as **Appendix A** is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode.

The Chief Executive Officer of the Company, (the "Administrator") shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorised to make modifications to the **Appendix A** from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

The documents which are covered under more than one heads of the **Appendix A** are to be maintained for the period under the head which specifies the longer period.

The documents/ records not specified in **Appendix A** shall be preserved as under:

1. As per the extant Applicable Law governing the records;

2. In case of there is no such law, the documents/ records are to be kept for Six Months after the expiry of validity of document/ records

5. Procedure for disposal of Documents

The Documents of the Company which are no longer required as per the time schedule prescribed in the **Appendix A** may be destroyed. The respective Department heads/ Employees in charge from time to time shall have to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under **Appendix A**.

6. Suspension of Documents disposal in the event of Litigation or Claims

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 disposal of documents which are subject matter of Notice/ Litigation, etc. shall be suspended till such time the matter is settled, resolved, or disposed off. The Administrator and/ or Legal Department and/ or respective Department heads/ Employees in charge, whenever it has come to their knowledge to do so and without waiting the communication from others, shall immediately inform all relevant Employees of the Company for suspension of further disposal of Documents.

7. Communication of this Policy

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the orientation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall be handed over within one month of the adoption of this Policy by the Board of Directors of the Company.

This Policy shall also be posted on the website of the Company.

8. Amendment

Any change, except as provided in the para four, in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

APPENDIX A – DOCUMENTS PRESERVATION SCHEDULE

The Documents Preservation Schedule is structurally organized as follows:

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and papers
- E. Property Records
- F. Projects Records
- G. Correspondence and Internal Memo
- H. Insurance Records
- I. Personnel Records
- J. Electronic Records

A: Corporate Records		
Sr.	Record Type	Preservation period
Documents to be retained permanently		
1	Certificates of Incorporation/ Certificate of Commencement of Business/ Certificate of Change of Name/ Registered Office	Permanent
2	Memorandum and Articles of Associations	Permanent
3	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
4	Statutory Registers	Permanent
5.	Licenses, approvals and Permissions which are subsisting	Permanent till expiry of one year of validity period
6	Register of Members	Permanent
7	Index of Members	Permanent
8	Common Seal	Permanent
Documents to be retained for shorter period of time		
9	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
10	Scrutinizers Reports	8 years
11	Board Agenda and supporting documents	8 years
12	Attendance Register	8 Years
13	Office copies of Notice of General Meeting and related papers	8 Years
14	Office copies of Notice of Board Meeting / Committee Meeting	8 Years
15	Share Transfer Deeds/ Demat Request Forms/ Remat Request Forms	8 Years
16	Statutory Forms Filed with Registrar of Companies	8 Years
17	Statutory Disclosures received from Directors	8 Years
18	Alterations in Memorandum and Articles of Associations	8 Years
20	Correspondence with Shareholders/	8 Years

	Debenture holders, if any/ Deposit holders, if any	
21	Register of Deposits, if any	8 Years
22	Structure Digital Database as per SEBI (Prohibition of Insider Trading) Regulations, 2015	8 Years
23	Disclosures – SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	8 Years
24	Disclosures – SEBI LODR Regulations	8 Years
25	Register of Debenture-holders, if any	8 years after the redemption of debentures
26	Index of debenture-holders, if any	8 years after the redemption of debentures
Miscellaneous		
27	Tape recording(s) or other electronic recording mechanism used for Board/ Committees/ Shareholders meetings held through video - conferencing or audio – visual means	Up to the time of completion of audit of that particular year.
28	Disclosures – SEBI (Prohibition of Insider Trading) Regulations, 2015	5 Years
29	Cancelled Share Certificates	3 years after cancellation.
30	All books and documents related to issue of share certificates including the blank forms of share certificates	30 years and in case of disputed cases, shall be preserved permanently
31	Disclosures made by the company to the stock exchanges shall be hosted on the website of the company	5 Years
19	Postal Ballot Forms	5 Years

B: Accounts and Finance

Sr.	Record Type	Preservation period
Documents to be retained permanently		
1	Annual Audit Reports and Financial Statements	Permanent
Documents to be retained for shorter period of time		
2	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or completion of assessment under Income Tax / Goods and Service Tax (“GST”)

		whichever is later
3	Bank Statements	8 years
4	Investment Records	8 years
Miscellaneous		
5	General Correspondence	2 years
6	Annual Plans and Budgets	2 years after completion of Audit

C: Tax Records		
Sr.	Records Type	Preservation period
Documents to be retained permanently		
1	Tax Exemption and Related documents	Permanent till relevant.
2	Tax Bills, receipts and payments	Permanent till relevant.
Documents to be retained for shorter period of time		
3	Excise Documents/ Records	10 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.
4	Tax Deducted at Source Records	10 years from the end of Financial Year or completion of assessment under the applicable law is over whichever is later.
5	Income Tax Documents/ Records	10 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
6	Service Tax Documents/ Records	10 years from the end of Financial Year or completion of assessment under Service Tax whichever is later
7.	GST Documents/ Records	10 years from the end of Financial Year or completion of assessment under Service Tax whichever is later

D: Legal Files and Records		
Sr.	Records Type	Preservation period
Documents to be retained permanently		
1	Court Orders, Contracts and Agreements	Permanent till relevant
Documents to be retained for shorter period of time		
2	Court Orders, Contracts and Agreements	5 years after termination or expiration of contracts or relevance of Court order
Miscellaneous		
3	Legal Memoranda and Opinions including subject matter files	3 years after the close of matter
4	Litigation files	3 years after close of the Litigations
5	Non-disclosure agreement	3 years after end of the validity period
6	Related correspondence to cases, contracts or agreements (including any proposal that resulted in the contract and other supportive documentation)	1 years after end of the validity period

E: Property Records		
Sr.	Records Type	Preservation period
Documents to be retained permanently		
1	Original Purchase and Sale Agreement/ Sale Deeds	Permanent till relevant
2	Ownership records issued by Government Authority	Permanent till relevant
Miscellaneous		
3	Sale Agreement/ Sale Deeds and Ownership records after disposing off	3 years after the close of matter

F: Correspondence and Internal Memo		
Sr.	Record Type	Preservation period
Miscellaneous		
1	Those pertaining to non-routine matters or having significant lasting consequences	5 years after termination or expiration of contracts
2	• [Proof of sending Notice and Agenda of Board and Committee Meetings and its delivery from the date of the Meeting	3 years

	<ul style="list-style-type: none"> • Proof of sending and delivery of the draft of the Resolution by circulation and the necessary papers from the date of the Meeting. • Proof of sending draft and signed Minutes and its delivery from the date of the Meeting.] 	
3	<ul style="list-style-type: none"> • Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. <ul style="list-style-type: none"> • Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings; Letters of general enquiry and replies that complete cycle of correspondence; • Letter of complaint requesting specific actions that have no further value after change of name or address; • Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary. 	1 year

G: Insurance Records

Sr.	Record Type	Preservation period
Documents to be retained permanently		
1	Current Insurance Policies which are valid	Permanent
Miscellaneous		
2	Expired Insurance Policies	3 years
3	Journal Entry support data	3 years
4	Inspections Reports	3 years
5	Claims records	1 Years after settlement is over and claim money is received
6	Group Insurance Plans	Until plan is amended or Terminated

H: Personnel Records

Sr.	Records Type	Retention period
Documents to be retained permanently		
1	Bonus, Gratuity and other Statutory Records	Permanent as long as

	of existing employees	relevant
Miscellaneous		
2	Time office Records and Leave Cards	3 years
3	Payroll Registers	3 years
4	Bonus, Gratuity and other Statutory Records of superannuated/ left employees	3 years
4	Unclaimed Wages Records	3 years
5	Employees Information Records	3 years after separation
6	Employees Medical Record	1 years after separation

Electronic Records

Electronic Mail

- All e-mails received from Internal and External Sources may be deleted after 90 days.
- Employees will strive to keep their e-mails related to business issues.
- All Emails related to business issues should be downloaded to a server or user directory on server.
- Employees are directed to take care not to send proprietary or confidential internal e-mails to outside sources.
- All e-mails of Employees which are important should be copied to the employees' folder.

Web Page Files: Internet cookies

- All workstations Internet Explorer should be scheduled to delete Internet cookies once per month.
- The Company does not automatically delete electronic files beyond the date specified in the Policy. It is the responsibility of all Employees to adhere to the guidelines specified in this Policy.
- Each month the Company will run backup copy of all electronic files including email on servers.
- This backup is safeguarded to retrieve lost information within 1 year retrieval period should the documents on network experience problems. The backup copy is considered a safeguard for the record retention system of the Company.

In certain cases, document will be maintained both paper and electronic form.