



Documents Preservation & Archival Policy

TABLE OF CONTENTS

1	Preamble	2
2	Scope	2
3	Administration	3
4	Objective of the Policy	3
5	Definitions	4
6	Interpretation	5
7	Periodical Review of the Policy by the Board	5
8	Responsibility of Employees for Preservation of Documents	5
9	Modes of Preservation	6
10	Procedure for Disposal of Documents	6
11	Suspension of Records Disposal in the event of Litigation or Claims	7
12	Communication of the Policy	7
13	Archival Policy	7
14	Manner of Public Disclosure of records published on the Website of the Company	8
15	Disclosure and Amendments	8
16	Board's Approval	8
	APPENDIX A- Documents Preservation Schedule	9
	APPENDIX B- Format of Register for Disposal of Records	17

1. Preamble

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as “SEBI (LODR) Regulations” or “Regulations”] requires every listed company to have a policy on Preservation of Documents/ records maintained by the Company either in Physical Mode or Electronic Mode.

Further, Regulation 30(8) of the Listing Regulations requires the Company to frame the archival policy for website disclosures.

2. Scope

A document preservation policy involves the systematic identification, categorization, maintenance, review, retention, and destruction of documents received or created in the course of business.

This policy shall govern the maintenance and preservation of documents as per applicable statutory and regulatory requirements and also deal with archival policy for website disclosures.

Any subsequent amendment/ modification in the applicable statutes in this regards shall automatically apply to this Policy.

The policy contains the guidelines, how long certain documents should be retained, how and when those documents should be disposed of if no longer needed, and how should be accessed or retrieved when they are needed as per the rules made under the law. Further, decision to preserve documents and records depends on important factors i.e. whether documents/records are publicly available, whether it is required by any statutory authorities from time to time or whether it is just informative document or holds any material information. The Policy also keeps a check to upload all requirement policies and information on the website of the Company and keep it uploaded for a period of five years as per requirement of Act.

3. Administration

The Company may preserve the Documents in electronic mode. The Board of Directors of the Company (the Administrator), shall be in-charge of administration of this Policy and may delegate to any person for implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorized to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

Any Documents /Records shall be made accessible to all concerned employee of company only with permission of respective departmental head/Director(s)/ CS/ CFO. Further all Director(s)/ CS/ CFO shall have full access of all records/documents of the company.

4. Objectives of the Policy

The major objectives of the policy are:

- a. Identification of statutory registers and other records of the Company which are required to be preserved.
- b. Identification and categorization of the statutory registers and other records to be maintained either for eight years or permanently.
- c. Decide whether the statutory records and documents are to be preserved in physical form or in electronic form.
- d. After completion of 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as per the guidelines of the Policy or as decided by the Board of Directors at that time.

- e. Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.
- f. Have a proper and regulatory compliant archival policy for website disclosures.

5. Definitions

- a. **“Act”** means the Companies Act, 2013, Rules framed thereunder and any amendments thereto;
- b. **“Regulations”** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto;
- c. **“Company”, “This Company”, “The Company”, “Company”** wherever occur in the policy shall mean “Ceinsys Tech Limited”.
- d. **“Current”** means running matter or whatever is at present in course of passage.
- e. **“Board of Director” or “Board”**, means the collective body of the Directors of the company;
- f. **“Policy” or “This Policy”** means, “Policy on Preservation of Documents” and “Archival Policy on Website Disclosures.”
- g. **“Maintenance”** means keeping Documents, either physically or in Electronic Form.
- h. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

- i. **“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.

6. Interpretation

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

7. Periodical Review of the Policy by Board

The policy will be reviewed periodically by the Top Management so that the policy remains compliant with applicable legal requirements and amendments effected to, subject to approval of the Board if and when practical difficulties are encountered. The Top management may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time. The Company will keep the policy updated as per applicable statutory guidelines.

8. Responsibility of Employees for Preservation of Documents

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company's employees would immensely help

company's litigation preparedness tool helping the Company's and Outside legal counsel to track down documents to handle the legal cases.

9. Modes of Preservation

The Documents may be preserved in:

- a. Physical
- or
- b. Electronic

The official of the Company required to preserve the document shall be Authorized Person who is generally expected to observe the compliance of statutory requirements as per 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 the concerned Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

10. Procedure for Disposal of Documents

The Records/documents preserved shall be reviewed every year or according to need by the respective department and examine those records which are due for disposal. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the Documents in the format prescribed at **Appendix B**.

11. Suspension of Record Disposal in the event of Litigation or Claims

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning Ceinsys Tech Limited or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. The Top Management in such case shall inform the employee by mail under "User list" of the need to retain the documents and suspension of disposal of the same.

12. Communication of this Policy

For all new Employees and Directors, a copy of this Policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees and Directors, a copy of this Policy shall upload on the Portal or website of the Company. This Policy shall also be posted on the web-site of the Company.

13. Archival Policy

As per Regulation 30(8) of the SEBI (LODR) Regulations, 2015, every equity listed entity is required to make disclosures to Stock Exchange(s) of any events or information which, in the opinion of the board of directors of the listed company, is material and such disclosures shall be hosted on the website of the listed company for a minimum period of 5 years & thereafter as per the Archival Policy of the company as disclosed on its website.

This Policy has been framed keeping in view the requirements of SEBI (LODR) Regulations, 2015. This Policy applies to such documents/information hosted and visible to the public on the website of the Company.

All disclosures made under Regulation 30 of the LODR by the Company to the Stock Exchange(s), shall be kept on the website of the Company for a period of 5 (five) years and thereafter as may be decided by Board of Directors of the Company time to time.

14. Manner of Public Disclosure of Records Published on Website of the Company

The documents required to be published on the website of the company as prescribed under Companies Act, 2013 & Regulations, shall be posted under "Investor" Section of Website till the stipulated period of time as provided under the applicable laws in force or for longer period as board may decide from time to time. The Company shall have the Authority to change the said place of contents in website in accordance to endeavour the information in more transparent manner.

15. Disclosure and Amendments

a) The Board or Committee so authorized for the purpose shall have the powers to review or amend any of the provisions of this Policy, substitute any of the provisions with new provisions or replace this Policy entirely with a new Policy.

16. Board's Approval

This policy is duly approved by the Board of Directors at its meeting held on November 11, 2015.

In case of any contradiction between statute and this Policy, the Statute shall prevail. If any matter which is not stated in the policy then the company shall comply the provisions in accordance with respective statute.

APPENDIX A

DOCUMENTS PRESERVATION SCHEDULE

Based on the recommendation of the management of the Company, the Board of Directors has classified the following documents to be retained and preserved for posterity.

The Documents Preservation Schedule is organized as follows:

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and Records
- E. Property Records
- F. Insurance Records
- G. HR & Personnel Records
- H. Electronic Records

A. Corporate Records

Sr. No.	Record Type	Period
Documents to be Retained Permanently		
1	Certificate of Incorporation	Permanent
2	Certificate of Change of Name	Permanent
3	Memorandum and Articles of Association, including any amendments thereof	Permanent
4	Statutory Register as prescribed in Companies Act, 2013	Permanent
5	Dividend reconciliation statement	Permanent
6	Register of Investments (other than Permanent securities not held in the name of the Company)(MBP-2)	Permanent
7	Register of Investment (held in the name of the Company)(MBP-3)	Permanent
8	Register of Contracts or arrangements in which directors are interested (MBP-4)	Permanent
9	Register of Members	Permanent
10	Register of Documents executed under Common Seal	Permanent
11	Register of Records and Documents destroyed	Permanent
12	Licences and Permits and Documents of other statutory approvals	Permanent
13	Board Meetings, General Meetings and Committee Meetings related documents such as: Notices, Notes to Agenda and other related documents	Permanent
14	Minutes Books as well as resolutions passed at Board, General Meetings and Committees Meetings	Permanent
15	License and Permissions	Permanent
16	Statutory Forms except for routine compliance	Permanent
17	Scrutinizers Reports	Permanent
Documents to be Retained for a Minimum period of 8 years		
18	Annual Returns	8 years from the filing with Ministry of Corporate Affairs
19	Register of Sweat Equity Shares	8 Financial Years from the date of last entry
20	Register of Investors Complaint	8 Financial Years from the date of last entry
21	Register of Directors attendance	8 Financial Years

22	Register of Proxies	8 Financial Years from the date of the meeting
23	Register of Inspection	8 Financial Years
24	Register of Deposits	8 Financial Years
25	Register of payment of Dividend	8 Financial Years from the date of Payment
26	Register of Buy- back of securities	8 Financial Years
27	Register of Charges	8 Financial Years
28	Register of Allotment	8 Financial Years
29	Statement of deviation or variation in use of issue proceeds.	8 Financial Years
30	Compliance Certificate to the exchange about the share related activities maintained by RTA registered with SEBI.	8 Financial Years
31	Corporate Governance Report submitted to the Stock Exchange on quarterly and annual basis.	8 Financial Years
32	Listing Fees documents	8 Financial Years
Miscellaneous		
33	Register of Debenture-holders, if any	8 years after the redemption of Debentures
34	Index of debenture-holders, if any	8 years after the redemption of Debentures
35	Register of Employees Stock option	8 years from the date of last entry

B. Accounts and Finance

Sr. No.	Record Type	Period
Documents to be Retained Permanently		
1	Annual Statutory Audit Reports and Financial Statements	Permanent
Documents to be Retained for a Minimum period of 8 years/Miscellaneous		
2	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
3	Accounts Payable ledgers and schedules	8 Financial Years
4	Accounts Receivable ledgers and schedules	8 Financial Years
5	Bank Statements and cancelled cheques	8 Financial Years
6	Investment Records	Till Maturity of Investments
7	Employee Expense Reports	8 Financial Years
8	Interim Financial Statements	8 Financial Years
9	Notes Receivable ledgers and schedules	8 Financial Years
10	Security deposit receipt copies	Till Maturity of Deposits
Miscellaneous		
11	General Correspondence	3 Years

C. Tax Records

Sr. No.	Record Type	Period
Documents to be Retained Permanently		
1	Tax Exemption documents and Related correspondence	Permanent
Documents to be Retained for a Minimum period of 8 years		
1	Tax Deducted at Source Records	8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.
2	Income Tax papers	8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.
3	Service Tax papers	8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.
4	Tax Bills, Receipts, Statements	8 Financial Years

D. Legal Files and Records

Sr. No.	Record Type	Period
Documents to be Retained Permanently		
1	Court Orders	Permanent
2	Legal Memoranda and Opinions including subject matter files	Permanent
3	Litigation files	Permanent

E. Property Records

Sr. No.	Record Type	Period
1	Original Purchase and Sale Agreement	Permanent
2	Property Card, Index II, Ownership records issued by Government Authority	Permanent
3	Property Insurance	Till the expiry of Term of Insurance
4	Project Documents and Related correspondence (including any Project and its proposal of the approval)	Permanent

F. Insurance Records

Sr. No.	Record Type	Period
1	Claims records	Till 1 years of settlement and claim money is received
2	Group Insurance Plans- retirees	1 Financial Year

G. HR & Personnel Records

Sr. No.	Record Type	Period
1	Payroll Registers	3 years
2	Bonus, Gratuity and other Statutory Records	3 years
3	Time office Records and Leave Cards	3 years
4	Employee Information Records	3 years after termination of service of employment
5	Employees Medical Records	3 years after termination of service of employment
6	Employees Earnings Records	3 years after termination of service of employment
7	Attendance records, Application forms, job or promotion records, Performance evaluations, Termination papers, test results, training and qualification records, enquiry related papers	3 years after termination of service of employment
8	Employment Contracts - Individual	3 years after termination of service of employment
9	Correspondence with Employment Agencies and Advertisements for job openings	3 years
10	Job Description	3 years after superseding the earlier document.

H. Electronic Records

1. Electronic Mail

- i. All e-mails received from Internal and External Sources may be deleted after 3 years.
- ii. Employees will strive to keep their e-mails related to business issues.
- iii. All Emails related to business issues should be downloaded to a server or user directory on server.
- iv. Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources.
- v. All e-mails of Employees which are important should be copied to the employees' folder.
- vi. Central IT team would archive email for six months after the staff has deleted it after which time the email will be permanently deleted.

2. Electronic Documents including PDF files

- i. PDF documents - Can be a maximum period of 1 year. But the said document may be destroyed depending upon the completion of the job or its use coming to an end.
- ii. Text/Formatted files: All word/excel/ Power point files may be deleted once every year depending on the importance or lack of it.

3. Web Page files

- i. May be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.
- ii. May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial 1 period of five years of live page.

APPENDIX B

FORMAT OF REGISTER FOR DISPOSAL OF RECORDS

[illegible]

Registered Office - Nagpur

Ceinsys Tech Ltd, 10/5, IT Park, Opp. VNIT,
Nagpur - 440022. Maharashtra, India
EPBX: +91 712 2249033/358/930 | Fax: +91 712 2249605

Corporate Office - Mumbai

Ceinsys Tech Ltd, 1601, Lodha Supremus, Senapati Bapat Marg,
Lower Parel West, Mumbai - 400013, Maharashtra, India
EPBX: +91 22 49472200