

KRITI INDUSTRIES (INDIA) LTD

POLICY ON PRESERVATION OF
RECORDS

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1. PEAMBLE

This Policy is formulated in terms of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. OBJECTIVE.

The purpose of this policy is to have a binding framework for the preservation of documents of the company, as approved by the Board of Directors of the company, which shall classify them in following categories as follows:

1. Documents whose preservation shall be permanent in nature; -Doc 1
2. Documents with preservation period of not less than eight (8) years after completion of the relevant transactions. - Doc 2
3. Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case - Doc 3
4. Documents like budget papers, bank guarantees etc., which may be retained for less than 8 years - Doc 4

Provided further that the Company may keep the documents as specified above in electronic mode.

3.PRINCIPLE RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENT-

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 documents pertaining to their area.

4. TYPE OF RECORD

A. Accounting and Finance Records

| Record Type | Retention Period | Document Type |
|--|-------------------------|----------------------|
| Accounts Payable ledgers and schedules | 8 Years | Doc-2 |
| Accounts Receivable ledgers and | 8 years | Doc-2 |

| | | |
|--|---|-------|
| schedules | | |
| Annual Audit Reports and Financial Statements, Tax and Vat Audit | Permanent | Doc 1 |
| General Ledger | Permanent | Doc 1 |
| Interim Financial Statements | 8 years | Doc-2 |
| Notes Receivable ledgers and schedules | 8 years | Doc-2 |
| Investment Records | Permanent | Doc 1 |
| Security deposit receipt copies | 3 years after termination of the contract | Doc-4 |
| Fixed Asset Register | Permanent | Doc 1 |
| Cost records | 8 years | Doc-2 |
| Bank Guarantees | Till the expiry of the claim period | Doc-4 |
| Tax Litigation documents | Permanent | Doc 1 |
| TDS, PF, ESI return and Challan | 8 years | Doc-2 |

B. Insurance Record

| Record Type | Retention Period | Document Type |
|---|-------------------------|----------------------|
| Annual Loss Summaries | 8 Years | Doc-2 |
| Group Insurance Plans -Active Employees | 8 Years | Doc-2 |
| Group Insurance Plans - Retirees | 8 Years | Doc-2 |
| Insurance Policies for the Company | 8 Years | Doc-2 |

| | | |
|----------------------------|---------|-------|
| Journal Entry Support Data | 8 Years | Doc-2 |
| Releases and Settlements | 8 Years | Doc-2 |

C. Tax records

| Record Type | Retention Period | Document Type |
|--|-------------------------|----------------------|
| Tax-Exemption Documents and related correspondence | 8 year | Doc-2 |
| Excise Tax records | Permanent | Doc-1 |
| Tax Assessment Orders. | 8 year | Doc-2 |
| Tax Returns | 8 year | Doc-2 |
| Sales Tax Records | 8 year | Doc-2 |
| Service Tax Records | 8 year | Doc-2 |

D. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities.

| Record Type | Retention Period | Document Type |
|---|-------------------------|----------------------|
| Memorandum and Article of the Company, Register of Member and Charges, Minutes of Board Meeting and Minutes of General Meeting, Common Seal, Annual Report. | Permanent | Doc-1 |
| Annual Financial Results, Quarterly Results. | 8 year | Doc-2 |
| ROC Filings and Stock Exchange filings in physical | 8 year | Doc-2 |

| | | |
|---------------------|--|--|
| and Electronic form | | |
|---------------------|--|--|

E. Legal Files and Records

| Record Type | Retention Period | Document Type |
|--|---|----------------------|
| Litigation files | 1 year after expiration of disposal of the case | Doc-3 |
| Court Orders | Permanent | Doc-1 |
| Correspondence, Property Deeds, Assessments, Licenses, Rights of Way | Permanent | Doc-1 |
| Original Purchase / Sale Deeds | Permanent | Doc-1 |
| Original Lease Agreements | 3 years after expiration of the lease | Doc-3 |

F. Personnel and HR Records

| Record Type | Retention Period | Document Type |
|--|-----------------------------------|----------------------|
| Time Cards | 2 years | Doc- 4 |
| Leave Records | 2 years after the relevant period | Doc- 4 |
| Retirement and Pension Records | Permanent | Doc- 1 |
| Personnel Files of individual employees | Permanent | Doc- 1 |
| Commission / Bonuses / Incentives / Awards | 2 years | Doc- 4 |
| Employee Medical Records | 2 years | Doc- 4 |

| | | |
|---|---------|--------|
| Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers. | 2 years | Doc- 4 |
| Employment Contracts - Individual | 2 years | Doc- 4 |

G. Miscellaneous Records

| Record Type | Retention Period | Document Type |
|--|---|----------------------|
| Consultant Reports | 3 years | Doc- 4 |
| Policy and procedures manuals - Original | Current Version with revision of Historic Version | Doc- 4 |
| Export Documentation | 8 years | Doc- 4 |
| Import Documentation | 8 years | Doc- 4 |
| Research & Publications | 3 years | Doc- 4 |

5. DESTRUCTION OF DOCUMENT

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

The temporary Documents, excluding the Current Document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved.

A register of the Documents 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 of Documents destroyed.

| PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF APPLICABLE LAW | DATE AND MODE OF DESTRUCTION | INITIALS OF THE AUTHORISED PERSON |
|--|-------------------------------------|--|
| | | |

6. GENERAL

Notwithstanding anything contained in this Policy, the Company shall ensure to comply with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

7. AMENDMENT

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.