

**POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS
IN ITS WEBSITE**

➤ **PURPOSE AND SCOPE**

The purpose of this policy is to preservation of its documents in accordance with the provisions of the Companies Act, 2013 and in accordance with the provisions of regulation 9 of Chapter III SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR").

The policy is intended to define for preservation of documents and to provide guidance to the executives and staff working in for Veto Switchgears and Cables Limited in making decisions and undertaking other activities that may have an impact on the operations of the Company.

The purpose for effective and compliant preservation of data encompasses to:-

- Meet the obligations when an organisation is required by legislation or another mandate to keep data.
- To maximize the investment of resources in data production when there is an expectation that they will continue to be available into the foreseeable future due to the cost of producing them.
- To avoid the embarrassment of losing data when an organization is identified as responsible for managing them.

This policy has been adopted and approved by the Board of Directors at its meeting held on 9th November, 2015.

➤ **PERIODICAL REVIEW OF THE POLICY BY TOP MANAGEMENT**

The Policy should be flexible and easy to understand and comply with by all levels of employees. The policy should be reviewed periodically by the Top Management 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.

➤ **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.

➤ **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 Veto Switchgears and Cables 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 entire employee by mail under "User list" of the need to retain the documents and suspension of disposal of the same.

Corporate Office :

➤ **CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED**

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

1. Company Records

S.No.	Record Type	Retention Period
1.	Certificate of Incorporation	Permanent
2.	Certificate of Change of Name	Permanent
3.	Memorandum and Articles of Association	Permanent
4.	Certificate to Commence Business	Permanent
5.	Minute Books as well as resolutions passed at General Meeting/Committee Meetings	Permanent
6.	Notice/Agenda and notes on Agenda and other related papers	8 Financial Years
7.	Register of Postal Ballot and Scrutinizer Report and Office copies of the notices	Until the resolution has been implemented or for a period of 10 Years, whichever is later
8.	Register of Allotments	8 Financial Years
9.	Register of Investments in securities not held in the name of the Company	Permanent
10.	Register of Buy-back of Securities	8 Financial Years
11.	Register of Charges	8 Financial Years
12.	Register and Index of Members	Permanent
13.	Register and Index of Debenture holder	15 Financial Years from the date of redemption of debentures
14.	Foreign Register of Members	Preserved until discontinued
15.	Foreign Register of Debenture holders	15 Financial Years from the date of redemption of debentures
16.	Register of renewed and duplicate certificates	Permanent
17.	Register of contracts in which Directors are interested	Permanent
18.	Register of Directors, Managing Director, Manager and Secretary	Permanent
19.	Register of Directors 'Shareholding	Permanent
20.	Register of Inter Corporate Loans and investments	Permanent
21.	Register of Deposits	8 Financial Years
22.	Register of payment of Dividend	8 Financial Years from the date of payment
23.	Dividend reconciliation statement	Preserved as long as any dividend remains unclaimed
24.	Register of Directors' Attendance	8 Financial Years
25.	Register of Proxies	8 Financial Years from the date of the meeting
26.	Register of Inspection	8 Financial Years
27.	Register of Investments (other than securities not held in the name of the Company)	Permanent
28.	Register of Documents executed under Common Seal	Permanent
29.	Register of Records and Documents destroyed	Permanent
30.	Register of Investors Complaint	8 Financial Years from the date of Last entry

31.	Register of transfer of shares	Permanent
32.	Register of Transmission of Shares	Permanent
33.	Register of Employees Stock Option	15 years from the date of exercise of options
34.	Register of Sweat Equity Shares	8 Financial Years from the date of Last entry
35.	Register in Respect of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	Permanent
36.	Register in Respect of SEBI (Prohibition of Insider Trading) Regulations, 2015	
37.	Books of Accounts	
38.	Annual Return	8 Financial Years
39.	Licence and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanent
40.	ROC Filings and Stock Exchange filings in physical and Electronic form	5 years from the date of filing
41.	Legal Memoranda and Opinions	3 years after the closure of the matter
42.	Litigation files	1 year after expiration of disposal of the case
43.	Court Orders	Permanent
44.	Annual Reports	Permanent

2. Accounting and Finance records including Annual Financial statement

S.No.	Record Type	Retention Period
1.	Accounts Payable ledgers and schedules	8 Financial Years
2.	Accounts Receivable ledgers and schedules	8 Financial Years
3.	Annual Audit Reports and Financial Statements	Permanent
4.	Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit
5.	Annual Plans and Budgets	3 years after the budget year is closed
6.	Bank Statement and Cancelled Cheques	8 Financial years
7.	Employee Expense Reports	8 Financial years
8.	General Ledger	8 Financial years
9.	Interim Financial Statements	8 Financial years
10.	Notes Receivable ledgers and schedules	8 Financial years
11.	Investment Records	8 Financial years
12.	Security deposit receipt copies	3 years after termination of the contract

3. Insurance Records

S.No.	Record Type	Retention Period
1.	Annual Loss Summaries	8 Financial Years
2.	Audits and Adjustments	8 Financial Years
3.	Claim Files (Including correspondence, medical records, injury documentation, etc.	8 Financial years
4.	Group Insurance Plans – Active Employees	8 Financial years
5.	Group Insurance Plans - Retirees	1 Financial year
6.	Insurance Policies for the Company	1 Financial year

7.	Journal Entry Support Data	8 Financial years
8.	Releases and Settlements	8 Financial years

4. Tax records

S.No.	Record Type	Retention Period
1.	Tax-Exemption Documents and related correspondence	8 Financial years
2.	Excise Tax records	8 Financial years
3.	Payroll Tax records	8 years
4.	Tax Bills, Receipts, Statements	8 years
5.	Tax Returns – Income, Franchise, Property	8 Financial years
6.	Tax workpaper packages - Originals	8 years
7.	Sales Tax Records	8 years
8.	Annual Information Returns – State and Central	8 Financial years
9.	Service Tax Records	8 years

5. Contracts entered into by the Company including Marketing Records

S.No.	Record Type	Retention Period
1.	Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents)	8 years

6. Property Records

S.No.	Record Type	Retention Period
1.	Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent
2.	Original Purchase / Sale Deeds	Permanent
3.	Original Lease Agreements	3 years after expiration of the lease

7. Payroll Records

S.No.	Record Type	Retention Period
1.	Employee Deduction Authorization	3 years after termination of service of employment
2.	Payroll Deductions	3 years after termination of service of employment
3.	Labour Distribution Cost Records including details regarding gratuity and retrial disbursements	3 years after termination of service of employment
4.	Payroll Registers (Gross and Net)	3 years after termination of service of employment
5.	Time Cards / Sheets	2 years
6.	Unclaimed Wage Records	3 years
7.	Leave Records	2 years after the relevant period

8. Personnel and HR Records

S.No.	Record Type	Retention Period
1.	Personnel Files of individual employees	Permanent

2.	Commission / Bonuses / Incentives / Awards	8 years
3.		
4.	Employee Earnings Records	3 years after termination of service of employment
5.	Employee Handbook & Induction Manual	3 Financial years
6.	Employee Medical 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

9. Programs & Service Records

S.No.	Record Type	Retention Period
1.	Attendance Records	3 years
2.	Program statistics, etc,	3 years
3.	Research & Publications	3 years

10. Corporate Social Responsibility Records

S.No.	Record Type	Retention Period
1.	Records on CSR Projects(including amount budgeted, spent and balance if any) projects undertaken and progress thereon	8 Financial years

11. Correspondence and Internal Memoranda

General Principle: Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract

1. Those pertaining to routine matters and having no significant, lasting consequences should be discarded within two years.
2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

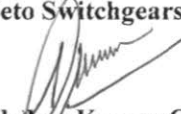
12. Electronic Documents including email retention and back up

1. Electronic Mail : Not all email needs to be retained, depending on the subject matters
 - All e-mail – from internal and external sources to be deleted after 12 months.
 - Staff will strive to keep all but an insignificant minority of their email related to business issues.
 - Central I.T team would archive email for six months after the staff has deleted it after which time the email will be permanently deleted.
 - Staff will not store or transfer the Company related emails on non-work related computers except as necessary or appropriate with due approvals from the Central IT team and the respective Managers.

- Staff will take care not to send confidential / proprietary information to outside sources.
 - Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employees' workplace.
2. Electronic Documents including PDF files.
- 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.
 - 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
- May be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.
 - May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial period of five years of live page.

For and on Behalf of

Veto Switchgears and Cables Limited



Akshay Kumar Gurnani
(Managing Director)
(DIN: 06888193)