

S H KELKAR AND COMPANY LIMITED
POLICY ON PRESERVATION OF DOCUMENTS

1. Introduction:

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 every listed Company is required to frame a policy on preservation of documents.

2. Purpose:

The purpose of this Policy for Preservation of Documents (hereinafter referred to as “**Policy**”) is to ensure that S H Kelkar and Company Limited retains its official documents in complete and accurate manner and in accordance with the requirements of all applicable laws and to ensure that official documents no longer needed by the Company are discarded at the proper time.

This policy categorizes the documents that will be preserved permanently without any time limit and the documents that will be preserved for specified period of time and outlines responsibilities to create, maintain and lawfully dispose of the documents. It endorses the preservation of documents in the Company’s Archives.

No director, officer or employee of the Company shall knowingly destroy a document with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any government department or agency or in relation to or contemplation of any such matter or case. This policy covers all records and documents of the Company.

3. Objective:

This Policy mechanism provides the comprehensive framework for preservation of documents for a specified period of time to achieve the following objectives:

- i) Effective corporate governance and risk management;
- ii) Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- iii) Systematic disposal/destruction of Company’s non-current records or documents that have outlived their administrative usefulness.
- iv) Identification of the Company’s records or documents that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company’s Archives.

4. Definitions:

- i) “**Company**” shall mean S H Kelkar and Company Limited.
- ii) “**Documents**” shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.
- iii) “**Listing Regulations**” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- iv) “**Records**” in relation to this policy includes accounting records, book and paper as defined in sub-section 12 of section 2, books of account as defined in sub-section 13 of section 2 of the Companies Act, 2013 and statutory and other documents of material significance.

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Agreement, Listing Regulations or any other relevant regulation/legislation applicable to the Company.

5. Records/Documents Covered:

For the purpose of achieving the above objectives, the documents covered as per this Policy have been divided into two sections, i.e. the records or the documents that will be preserved permanently by the Company and the records or the documents that will be preserved for the period of atleast certain years and not permanently. This Policy applies to the records maintained by the Company in any format or medium. The records which are not required to be retained permanently shall be disposed off according to this Policy.

This Policy applies to all official records generated in the course of the Company's operations, including but not limited to:

- i) typed or printed hardcopy (i.e. paper) documents;
- ii) electronic records and documents (e.g., email, web files, text files, PDF files etc.);
- iii) video or digital images;
- iv) graphic representations;
- v) electronically stored information contained on network servers and/or document management systems;
- vi) recorded audio material (e.g., voicemail);
- vii) other kind of records.

6. Administration:

i) Record Preservation Schedule:

Attached to this Policy is a Record Preservation Schedule (Annexure A) that is approved as the maintenance and preservation schedule for official records of the Company. It shall be the duty of the Head of each Department to administer this Policy and implement reasonable processes and procedures concerning the Record Preservation Schedule.

ii) Distribution of Policy to Employees and Officers:

The Head of the Department will arrange for every officer and employee who may have control over or responsibility for the Company's documents to receive a copy of this Policy and ensure that he or she has received a copy of this Policy, has read and understood it and has agreed to comply with it.

7. Record Storage Procedures:

i) Organization of Records:

In order to facilitate administration of this Policy, where practicable, the Company's official records should generally be organized and stored according to general categories in a manner that best facilitates the efficient administration of the Company's operations where appropriate. Records within each category should generally be organized and stored in chronological order or by time period (e.g., by month or year).

ii) Dating of Records:

Categories of records not required to be retained on a permanent basis (according to the Record Preservation Schedule) should be maintained by date or conspicuously dated to enable such records to be easily identified for destruction at the end of the record preservation period specified in the Record Preservation Schedule.

iii) Confidentiality of Records:

Records containing confidential information should be labeled and/or stored in a manner to limit access to those employees or other individuals with authorization to view such records. The Company provides its employees with email as a tool for performing its employees' work functions. While the Company understands that employees may use their email to conduct personal business, employees should be aware that they have no expectation of privacy for any information or communications contained in work-related email accounts. The Company reserves the right to review any of the Company's email at any time.

iv) Electronic Storage System:

The IT Department of the Company is authorized to develop and implement a system for maintaining the Company's records via an electronic storage system that either images hardcopy records or transfers computerized records to electronic storage media (e.g., hard drives, storage area networks or optical media such as CDs and DVDs).

v) Location of Records:

The records shall be located at the locations specified in the respective statutes viz. registered office, corporate office, plants, facilities etc as the case may be. The records for which no specific place has been specified under any statute may be maintained at the corporate office of the Company or at any other place as may be, decided by the officers of the Company considering their utilization and usefulness.

8. Confidentiality and ownership:

All records are the property of the Company and employees are expected to hold all business records in confidence and to treat them as the Company's assets. Records must be safeguarded and may be disclosed to parties outside of the Company only upon proper authorization. Any subpoena, court order or other request for documents received by employees or questions regarding the release of the Company's records must be directed to the Head of the respective Department, prior to the release of such records. Any records of the Company in possession of an employee must be returned to the employee's successor or person in charge or the Head of the Department, upon termination of employment.

9. Roles and Responsibilities:

The respective Departmental Heads of the Company 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.

10. Destruction of Records:

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal

administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant. This applies to both Physical and Electronic Documents.

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 the Company or commencement of any litigation against the Company, such employee shall inform the Head of the Department and any further disposal of documents shall be suspended until such time as the Head of the Department with the due advice from the legal counsel determine otherwise.

12. Emergency Planning:

Documents shall be stored in a safe and accessible manner. Documents which are necessary for the continued operation of the Company in case of an emergency shall be regularly duplicated or backed up and maintained at a place which is outside / at remote location. The Company shall develop reasonable procedures for document retention in the case of an emergency.

13. Review:

The Board of Directors shall review the Policy from time to time and may amend the same in line with the business requirements or requirement of the SEBI Guidelines or any other rules, regulations etc. which may be amended and applicable from time to time, as the case may be.

Annexure A

Record Preservation Schedule

This Record Preservation Schedule sets forth an abbreviated schedule of key record-keeping holding periods and maintenance requirements. It is not intended to and does not provide a complete compilation of all statutory record-keeping holding periods or maintenance requirements. The information listed in the schedule below is intended as a guideline and may not contain all the records that the Company may be required to keep in the future.

Function	Record Type	Preservation Period
Taxation	Annual Tax Returns	Permanent
	Periodical Tax returns	10 years
	Tax-Exemption Documents	10 years
	Tax Audit and Working Files	10 years
	TDS Monthly Files	3 years
	Payroll Tax records	3 years
	Files for original purchase invoices for VAT, Excise and Service Tax	10 years
	Refund and Rebate Claim	10 years
	Proof of Exports	10 years
	Assessment, Audit and Returns related files	Till time the matter is resolved
	Files regarding matters under litigation	Till time the matter is resolved
Accounts & Finance	Annual Financial Statements and Audit Reports	Permanent
	General Ledger	Permanent

	Interim Financial Statements	10 years
	Treasury documents – Credit approvals from bank	Permanent
	Salary/Wages/Bonus Sheets, Cash/Bank Vouchers, Bank Statements, Bills, Invoices, Journal Vouchers, MIS Records	10 years
	Cost Records	8 years
	Accounts Payable	8 years
	Accounts Receivable	8 years
	Bank Statements, Reconciliations & Deposit Slips	8 years
	Canceled Checks – routine	8 years
	Employee/Business Expense Reports/Documents	8 years
	Bank Account passbook or statement, Bank Reconciliation Statement and LC Documents	8 years
	Other Documents maintained	Less than 8 years
	Files regarding matters under litigation	Till time the matter is resolved
	Bank Guarantees	Till the expiry of the claim period
Insurance	Claim Files (Including correspondence, medical records, injury documentation, etc.)	Permanent
	Group Insurance Plans - Retirees	3 Years
	Insurance Policies for the Company	10 years
	Releases and Settlements	10 years
	Annual Loss Summaries	3 Years
	Audits and Adjustments	3 Years
	Group Insurance Plans – Active Employees	3 years
	Journal Entry Support Data	3 years
Legal & Secretarial	Corporate Records (certificate of incorporation, commencement of business, listing agreement, common seal, minutes book of board and committees thereof, annual reports originals, etc.)	Permanent
	Licence and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanent
	ROC Filings and Stock Exchange filings in physical and Electronic form	8 years from date of filing
	Legal Memoranda and Opinions	3 years after the closure of the matter
	Litigation files	1 year after expiration of disposal of the case
	Court Orders	Permanent
	Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent
	Original Purchase / Sale Deeds	Permanent
	Original Lease Agreements	3 years after expiration of the lease
	Contracts and Related Correspondence	5 years from the date of expiry of contract
IT	Vendor Invoice / Quotation	3 Years
	Microsoft / SAP / Other licenses	Upto renewal period / period of license
	New Email Id / SAP Id request	1 Year
	SAP authorization / change / reversal request	3 Years

	New Material code creation request	3 Years
	Material loss / gain request	3 Years
	Installation certificate	3 Years
	Approved P.O.	3 Years
HR/Admn	PF & ESIC Challans and Returns, ER1, ER2, Labour Welfare Fund documents, Professional Tax Challans	5 Years
	License under Shops and Establishment Act	Until the validity of license
	Gratuity related data	3 Years
	Bonus Register and Returns, Statutory online submissions	2 Years
	Salary Sheets	3 Years
	Leave Data, Loan Data, LTA Data, TADA Vouchers	As per need
	Full and Final Data	1 year after employee leaving
	Personal File data of employees	During currency of employment and thereafter for one year
Marketing	Business Notes, Contract Notes, Sales Orders, Letter of Credit, Invoices, Shipping Bills, Packing List, Others documents as per contract terms	1 Year
Misc.	Photocopies of documents required to be preserved in accordance with this policy	1 Year from the date of obtaining a copy