

POLICY FOR PRESERVATION OF DOCUMENTS

*Pursuant to Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements)
Regulations, 2015*

BATLIBOI LIMITED

1. Introduction

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) the Board of Directors (“the Board”) of Batliboi Limited has adopted this policy for Preservation of Documents in the Board Meeting of the Company held on 30th January, 2016.

The Board may further amend this Policy from time to time as they may deem fit and/or incorporate any subsequent amendment(s)/ modification(s) in the Listing Regulations with respect to matters covered under this Policy or otherwise.

2. Scope

This policy shall govern the maintenance and preservation of documents of the Company as per applicable statutory and regulatory requirements.

3. Objective of the Policy

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations and as per Policy framed in compliance with the Regulations and to ensure that the records no longer needed or are of no value are discarded after following the due process for discarding the same.

The major objectives of this policy are:

- Identification of statutory registers and other records of the Company which are required to be preserved.
- Identification and categorisation of statutory registers and other records to be maintained eight years or permanently.
- Decide whether the statutory records and documents are to be preserved in physical form or in electronic form.
- After completion of the 8 years, for the statutory documents which are to be preserved for 8 years only may be disposed of as decided by the Board of directors at that time.
- Aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records.

4. Definitions

“**Board of Directors**” or “**Board**” means the Board of Directors of Batliboi Limited., as constituted/re-constituted from time to time.

“**Company**” means Batliboi Ltd.

“**Listing Regulations**” means SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“**Policy**” or “**this Policy**” means Policy for Preservation of Documents.

“**Stock Exchanges**” means the stock exchanges where the Company’s shares are listed.

“**SEBI**” means Securities & Exchange Board of India.

“**Maintenance**” means keeping Documents, either physically or in Electronic Form.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

“Electronic Form” with reference to information means any information generated, sent, received or stored in physical, media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.

5. Guidelines

Regulation 9 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, Provides that the listed Company shall have policy for preservation of documents approved by its Board of Directors, classifying them in two categories as follows:-

- a. Documents whose preservation shall be permanent in nature.
- b. Documents with preservation period not less than 8 years after completion of the relevant transactions.

Accordingly, the company has classified the preservation of documents to be done in following manner:

- a. documents that needs to be preserved and retained permanently;
- b. documents that needs to be preserved and retained for a period of 8 years as specified under the Companies Act, 2013 or Regulations;
- c. documents that need to be preserved and retained for such period as prescribed under any statute or regulation as applicable to the Company.
- d. Where there is no such requirement as per applicable law, then for such period as the documents pertain to a matter which is “Current”.

An indicative list of the documents and time frame of their preservation is provided in **Annexure – A**.

These documents mentioned above can be maintained by the Company in physical or electronic or digital mode, if permitted under the applicable Acts/Rules/Regulations.

6. Preservation of Documents

- I. Documents as per Annexure A and those which are required to be maintained under various Acts/Rules/Regulations applicable to the Company shall be maintained and preserved as per the provisions content therein.
- II. It shall be the responsibility of the concerned head of department to keep the annexed Documents Preservation Schedule updated from time to time to ensure that it is in compliance with the various Acts/Rules/Regulations applicable to their respective Departments and for this purpose, they shall communicate any changes desired in the abovementioned Schedule to the Company Secretary.
- III. In case of any inconsistency in the annexed Documents Preservation Schedule and the provisions of various Acts/Rules/Regulations applicable to the Company, such provisions shall prevail.
- IV. The concerned head of department shall keep in his custody the documents which are of important and/or confidential nature and list of the same shall be maintained in a Register to be kept in his/her custody and he/she shall be responsible for the preservation of the same. The said documents alongwith the Register shall be handed over by him/her to the successor in the event of such head of department leaving the Company/Department.

7. Destruction of Documents

- I. After the expiry of the preservation period specified in the annexed Documents Preservation Schedule, such documents which are no longer required may be destroyed by the concerned department after obtaining prior approval of Chairman & Managing Director of the Company. The records of the documents destroyed shall be maintained by the concerned department and shall be produced whenever required by the concerned authority/auditors.
- II. In case any specific procedure is prescribed under applicable Act/Rules/Regulations for destruction of the documents, the same shall be followed by the Company.
- III. Where the Company has been served with any Notice requisitioning documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed off finally.
- IV. 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 format prescribed in **Annexure-B**.

8. Archival of Documents

Documents mentioned in the annexed Documents Preservation Schedule which are not required regularly can be archived by the concerned department in the following manner:

- I. Documents to be archived should be kept in the storage locations earmarked by the Company for the purpose in secured place or cupboard having access only by the authorised personnel.
- II. Documents should be stored in a way that preserves their integrity and readability and restricts access to authorized personnel only;
- III. The medium used to store documents shall be such that those documents remain complete and legible throughout the required period of retention and can be made available to the Auditors or Regulatory Authorities upon request;
- IV. The concerned department head should maintain a record of documents archived.
- V. Electronic records i.e. e-mails, files etc. should be archived as per IT Policy of the Company.

9. Policy Review

This policy shall be subject to review, if necessary. Any change / amendments in applicable statues with regard to maintenance and preservations of documents and records shall be deemed to be covered in this policy without any review. Any change / amendments to this policy shall be approved by the Chairman and /or Managing Director.

10. Disclosures

The Company shall disclose this Policy on its website and a web link thereto shall be provided in the Annual Report.

ANNEXURE A
Documents Preservation Schedule

Sr. No.	Type of Document	Preservation Period	Concerned Department
1.	Common Seal	Permanent	Secretarial
2.	MOA/AOA	Permanent	Secretarial
3.	Certificate of Incorporation, Certificate of Change in Name etc.	Permanent	Secretarial
4.	Statutory Registers	Permanent	Secretarial
5.	Register of Members	Permanent	Secretarial
6.	Minutes Book	Permanent	Secretarial
7.	Index of Members	Permanent	Secretarial
8.	MCA Forms	Permanent	Secretarial
9.	Scrutinizers Reports	Permanent	Secretarial
10.	Annual Audit Reports and Financial Statements	Permanent	Secretarial
11.	Annual Returns	8 Years	Secretarial
12.	Attendance Register	8 Years	Secretarial
13.	Insurance Policies	4 Years	Finance & Account
14.	Tax Exemption and Related documents	Permanent	Finance & Account
15.	Annual Plans and Budgets	4 Years	Finance & Account
16.	Bank Statements	4 Years	Finance & Account
17.	Investment Records	8 Years	Finance & Account
18.	Journal Entry support data	8 Years	Finance & Account
19.	Books of Accounts, Ledgers and Vouchers	8 Years from the end of Financial Year or completion of assessment under Income Tax whichever is later	Finance & Account
20.	Excise Records	8 Years from the end of the Financial Year or completion of assessment under the applicable law is over Whichever is later.	Finance & Account
21.	Tax Deducted at Source Records	8 Years from the end of Financial Year or completion of assessment under the applicable law is over whichever is later.	Finance & Account
22.	Income Tax papers	8 Years from the end of Financial Year or completion of assessment under Income	Finance & Account

		Tax whichever is later	
23.	Service Tax papers	8 Years from the end of Financial Year or completion of assessment under Service Tax whichever is later	Finance & Account
24.	Court Orders	Permanent	Legal
25.	Original Property Purchase and Sale Agreement	Permanent	Legal
26.	Property Card, Index II, Ownership records issued by Government Authority	Permanent	Legal
27.	Legal Memoranda and opinion including subject matter files	3 Years after the close of matter	Legal
28.	Litigation files	3 Year after close of the Litigations	Legal
29.	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 Years after termination or expiration of contracts	Legal
30.	Payroll Registers	8 Years	HR & Account
31.	Bonus, Gratuity and other Statutory Records	8 Years	HR & Account
32.	Employees Medical Record	3 Years after separation	HR
33.	Time office Records and Leave Cards	3 Years	HR & Admin
34.	Unclaimed Wages Records	8 Years	HR & Account
35.	Employees Information Records	5 Years after separation	HR
36.	E-mails	As per IT Policy of the Company	IT
37.	Purchase Order and related correspondence	3 Years from the end of Financial Year	Purchase
38.	Project Documents and Related correspondence (including any proposal of the Project and its approval)	8 Years	Operation
39.	Factory License and Permissions	Permanent	Works
40.	General Correspondence	3 Years	Secretarial/ Finance & Account /Legal/Purchase/ Operation/HR/IT

Annexure-B

Specimen format of the register of documents disposed off / destroyed

Particulars of documents alongwith provision of law	Date and mode of destruction	Initials of the Authorised Person