



## REDINGTON LIMITED

### Policy on Policy on Preservation of documents

<b>Policy approved by</b>	Board of Directors of Redington Limited <i>(formerly known as Redington (India) Ltd)</i>
<b>Date of approval of current version</b>	November 12, 2020
<b>Policy effective from</b>	November 12, 2020
<b>Version No.</b>	<b>02/2020</b>

## **Policy on Preservation of documents**

---

### **Purpose**

The purpose of this Policy on Preservation of documents ("The Policy") is to ensure that Redington (India) Limited ("Redington", "Company") categorises and retains its official records in accordance with the requirements of all applicable laws and to ensure that there is a proper mechanism in place to maintain records, to preserve and store the old records and to destroy/dispose the old and time barred records.

### **Scope**

This Policy applies to all official records generated in the course of the Company's operations, including but not limited to typed, or printed hardcopy (i.e., paper) documents, electronic records and documents (e.g., email, Web files, text files, PDF files) etc.

### **Definitions**

"Official record(s)" refers to papers, notes, agreements, notices, advertisements, requisitions, order, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any applicable law, whether issued, sent, the time being in or otherwise, maintained on paper or in electronic form received or kept in pursuance of the Act or under any other law for and does not include multiple or identical copies.

"Electronic Record(s)" means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

"Electronic Form" means on any 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.

"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.

### **Maintenance of Official records**

The Company shall maintain the official records either in physical or electronic form in compliance with requirement of all applicable laws. The applicable provisions of law, rules and regulations with regard to maintenance of official records in electronic form shall be adhered to.

All the official records shall be maintained as per the prescribed formats, if any, as amended from time to time, under the various rules and regulations.

## **Preservation of Official Records**

The Record Maintenance and Preservation Schedule ("Schedule") approved by the Board of Directors for initial maintenance, preservation and disposal schedule for the official records is as given in the Annexure.

The Company shall preserve all the official records for such period as mentioned in the Schedule. If as per any applicable law including Information Technology Act, official records in physical or electronic record should be preserved for a longer period than what has been stipulated in the Schedule, then such records shall be preserved as per the applicable statutory stipulations.

## **Responsibility of Employees for Maintenance and Preservation of Documents**

All the Employees in the permanent rolls of the Company are responsible for maintenance and preservation of the documents in their work area in accordance with the Schedule and their decision to retain/preserve or destroy documents pertaining to their area.

## **Administration**

The 'Document Preservation and Destruction Team' (Administrator) comprising of below officials of company is in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Schedule is followed and to ensure that the policy is complied with.

1. Compliance Officer
2. Head of Administration
3. Chief Information Officer or any person nominated by him
4. One person nominated by Whole time Director

## **The Administrator is also authorized to**

- Make modifications to the Schedule from time to time to ensure that it is in compliance with laws applicable.
- Periodically review the record maintenance, preservation and disposal program.
- Monitor compliance with this Policy.

## **Suspension of Record Disposal in the event of Litigation or Claims**

In case the Company is served with any notice for request of official records 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 Administrator and any further disposal of official records shall be suspended until such time as the Administrator with the due advice from the legal counsel determine otherwise.

## **Disposal and Destruction of Records**

After the expiry of the preservation period, the preserved documents may be destroyed. Destruction of documents as a normal administrative practice shall be followed for the records which are duplicate/unimportant/irrelevant.

This applies to official records in both Physical and Electronic form. The documents may be destroyed as follows:

- Recycle non-confidential paper records;
- Shred or otherwise render unreadable confidential paper records; or
- Delete or destroy electronically stored data.