



REDINGTON LIMITED

Policy on Policy on Preservation of documents

Policy approved by	Board of Directors of Redington Limited <i>(formerly known as Redington (India) Ltd)</i>
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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.

APPENDIX

Type of Record

Type of Record	Team Responsible for maintenance
<ol style="list-style-type: none"> 1. Accounting and Finance records including Annual Financial statement 2. Insurance Records 3. Tax records 	Finance and Accounts team
<ol style="list-style-type: none"> 1. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities. 2. Legal opinions related to Corporate laws 	Secretarial Team
<ol style="list-style-type: none"> 1. Contracts entered into by the Company with the Vendors and Channel Partner 2. Legal Files and Records 3. Property Records 4. Bank Guarantee from Channel Partners 	Legal Team
<ol style="list-style-type: none"> 1. Dealer Registration Forms 2. Cover Cheques 3. Credit Insurance Policy 4. Property Collateral documents 5. Letter of Credit 6. Accounts Receivable Ledgers and Schedules 7. General Ledgers related to Receivables 8. Credit Manual (SOP) 9. Most correspondence and Internal memorandum 1. TDS Certificates 	Credit Team
<ol style="list-style-type: none"> 1. Payroll Records 2. Pension and retiral related Records 3. Personnel and HR Records 	Human Resources Team
<ol style="list-style-type: none"> 1. Correspondence and Internal Memoranda 	Respective team
<ol style="list-style-type: none"> 1. Electronic Documents including email retention and back up 	Information Technology Team

1. Accounting and Finance records including Annual Financial statement

Record Type	Retention Period
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Accounts Payable ledgers and schedules	8 Years
Accounts Receivable ledgers and schedules	8 Years
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit
Annual Plans and Budgets	3 years after the budget year is closed
Bank Statement and Cancelled Cheques	8 years
Employee Expense Reports	8 years
General Ledger	Permanent
Interim Financial Statements	8 years
Notes Receivable ledgers and schedules	8 years
Investment Records	Permanent
Security deposit receipt copies	3 years after termination of the contract

2. Insurance Records

Record Type	Retention Period
Claim Files (Including correspondence, medical records, injury documentation, etc.)	Permanent
Group Insurance Plans – Active Employees	8 years
Group Insurance Plans - Retireees	Permanent
Insurance Policies for the Company	Permanent
Journal Entry Support Data	8 years
Releases and Settlements	Permanent

3. Tax records

Record Type	Retention Period
Tax-Exemption Documents and related correspondence	Permanent
Excise and customs Tax records	Permanent
Payroll Tax records	8 years
Tax Bills, Receipts, Statements	8 years
Tax Returns – Income, Franchise, Property	Permanent
Tax workpaper packages - Originals	8 years
Sales Tax Records	8 years
Annual Information Returns – State and Central	Permanent
Service Tax Records	8 years
License and registrations	Permanent

4. Contracts entered into by the Company with the Vendors and Channel Partner

Record Type	Retention Period
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents	Till the continuance of the contracts and 8 years thereafter

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

Record Type	Retention Period
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	5 years from the date of filing

6. Legal Files and Records

Record Type	Retention Period
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

7. Property Records

Record Type	Retention Period
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent
Original Purchase / Sale Deeds	Permanent
Original Lease Agreements	3 years after expiration of the lease

8. Payroll Records

Record Type	Retention Period
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Payroll Deductions	3 years after termination of service of employment
Labour Distribution Cost Records including details regarding gratuity and retiral disbursements	3 years after termination of service of employment
Payroll Registers (Gross and Net)	3 years after termination of service of employment
Time Cards / Sheets	2 years
Unclaimed Wage Records	3 years
Leave Records	2 years after the relevant period
Retirement and Pension Records	Permanent

9. Personnel and HR Records

Record Type	Retention Period
Personnel Files of individual employees	3 years after termination of service of employment
Commission / Bonuses / Incentives / Awards	3 years after termination of service of employment
Employee Earnings Records	3 years after termination of service of employment
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
Employment Contracts - Individual	3 years after termination of service of employment
Correspondence with Employment Agencies and Advertisements for job openings	3 years

10. 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.

11. 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 24 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 8 years. 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 Listing Regulations.
- 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.

12. Miscellaneous Records

Record Type	Retention Period
Consultant Reports	3 years
Policy and procedures manuals – Original	Current version with revision history
Policies and procedures manuals - Copies	Retain current version only
Annual Reports	Permanent