

CEIGALL INDIA LIMITED

4.A DOCUMENTS PRESERVATION POLICY

1. Background

In terms of Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, as amended ("**LODR Regulations 2015**"), which are applicable to all companies whose securities are listed on stock exchanges, a listed entity is required to formulate and put in place a policy for preservation of documents, approved by its Board of Directors classifying them into at least two categories i.e. :

- (a) documents whose preservation shall be permanent in nature;
- (b) documents with preservation period of not less than eight years after completion of the relevant transactions.

2. Objective

The objective of this Policy is to have a binding framework for the preservation of documents of the Company, as approved by the Board of Directors of the Company and aims to provide effective and efficient control over documents that needs to be preserved and its disposal after elapse of time while at the same time avoiding excessive inventory of documents. The Company, therefore, formulates this policy ("**Policy**"), in pursuance of Regulation 9 of the Regulations.

3. Definitions

- a. "**Applicable Law**" means any law, rules, regulation, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs, The Institute of Company Secretaries of India or any other law, rules, regulations, circulars, guidelines or standards under which the preservation of the documents has been prescribed.
- b. "**Board of Directors**" means the Board of Directors of Ceigall India Limited, as constituted from time to time.
- c. "**Company**" means Ceigall India Limited.
- d. "**Document(s)**" means any papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, disclosures, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.
- e. "**Electronic Form**" means storage on any contemporary electronic device such as computer, laptop, compact disc, floppy disc, USB devices, servers, storage, emails, 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. All other words and expressions used and not defined in this Policy shall derive their meaning from the Applicable Law.

4. Classification of documents

The preservation of documents of the Company shall be classified into the following categories:

- i. Documents whose preservation shall be permanent in nature;
- ii. Documents with preservation period of not less than eight years after completion of the relevant transactions or for such a period as per Applicable Law.
- iii. Documents whose preservation period is not stipulated by Applicable Law, hence decided in this Policy.

5. Mode and Responsibility of Preservation

- a) The documents as specified may be preserved in Physical Form or Electronic Form. However, all vital documents shall be scanned for digitisation and may be preserved under the control of Head of Department (HOD) or Function Head. Whenever a document is maintained both in Physical and in Electronic Form, the authenticity with reference to the Physical form shall be considered for every purpose.
- b) All documents and records must be properly maintained in appropriate storage facilities commensurate with the size and nature of documents, which allow proper access and at the same time ensure protection from any loss or damage due to theft, fire, flood, termite etc. A comprehensive list of documents preserved, location of storage, access control shall be maintained by the respective HOD or Function Head.
- c) Electronic version of the documents is to be maintained in the Company's centralised database maintained by IT department of the Company. For maintenance of documents and records in electronic form, the computer & storage systems used must be of appropriate configuration with reliable Back-up and with necessary safeguards including firewall security to prevent any data theft, loss, hacking etc.
- d) The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.
- e) The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.
- f) 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 to decide to retain/preserve or destroy documents pertaining to their area in consultation with their superiors. HOD or Function Head shall ensure security and access restrictions for maintaining the integrity and confidentiality of the documents.

6. Custody of the Documents

Subject to the Applicable Law, the custody of the documents shall be with the HOD or Function Head. Where the HOD or Function Head tenders resignation or is transferred from one location to another of the Company, such Person shall hand over all the relevant documents, lock and key, access control or password, or Company Disc, other storage devices or such other documents and devices in his possession under the Policy to the next in charge or such person authorised by the Management. Where for any business requirements, any vital document including key agreement, regulatory approval / permit / license, certificate or other similar document or record, has to be carried out of the office premises, the same shall be done after proper authorization from the HOD or Function Head.

7. Conversion of the form in which the Documents are preserved

The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

8. Destruction of Documents

Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or required for short term use only which is over. This applies to both Physical and Electronic Documents. The Documents, excluding any document(s), that still has a relevance with reference to any ongoing litigations, proceedings, complaints, disputes, contracts, agreements, MOUs or any other on-going matters shall be destroyed after the relevant or prescribed period mentioned in the policy, by the HOD or Function Head in whose custody the documents are stored. A Record of the documents disposed/destroyed shall also be maintained, with signature of the HOD quoting the order of the Management. It shall state the brief contents and particulars of the documents destroyed, date and reason of disposal/destruction and the mode of destruction, and no copy of the document needs to be taken/retained. If an employee has reasons to believe, or the Company informs the employee concerned, that Company records are relevant to litigation, or potential litigation (i.e. a dispute that could result in litigation), then the employee must preserve those records until the Legal or respective Department Head determines that the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records. If an employee believes that exception may apply, or has any question regarding the possible applicability of that exception, he/she may contact the Office of the Head of Legal.

9. Amendment of the Policy

The Board may, subject to the applicable laws or on their own, amend/modify any provision(s) or substitute any of the provision(s) with new provision(s) or replace this Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force. In any circumstance, where the scope, terms and conditions of this Policy differs from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy and procedures until such time as this policy is changed to conform to the law, rule, regulation or standard.

10. Enforcement

This policy is applicable for all employees and directors of the Company who contribute to the process of creation, maintenance and destruction of documents. Considering the significance of the problems that the Company may face due to non-availability of vital and critical/classified documents, any violation shall be considered as a serious negligence of duty. The Company Secretary shall ensure compliance to this Policy and provide assurance to the Board at quarterly intervals by way of a certificate.

11. Audit

Internal Audit team will review & ensure comprehensiveness of documents covered & adherence to the Policy at least once a year.

12. Dissemination of the Policy

This Policy, as amended from time to time, shall be published on the Company's internal portal or on its website.

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