

POLICY FOR PRESERVATION OF DOCUMENTS

1. Preface

The Board of Directors (the “Board”) of Orient Bell Limited (the “Company”) has approved the Policy for Preservation of Documents (“the Policy”) of the Company for preservation of documents and records maintained by the Company either in physical mode or electronic mode (hereinafter referred to as “Documents”). This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

2. Scope

This Policy is applicable to the preservation of all the Documents that are required to be maintained under the applicable laws for the time being in force and amended from time to time.

3. Objective

The objective of this Policy is to have a binding framework for the preservation of Documents of the Company, which shall classify them in the following categories:

- a) Documents whose preservation shall be permanent in nature;
- b) Documents with preservation period shall not be not less than the period as may be prescribed under the applicable laws.

The preserved documents must be accessible at all reasonable times.

4. Mode of Preservation

The Company may keep the Documents either in electronic mode or in physical mode.

5. Administration:

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. The Heads of the respective departments of the Company shall be responsible for maintenance of the Documents.

Documents Preservation Schedule is given below in **Appendix A to this Policy**.

6. Disposal and Destruction of Documents

- The Documents of the Company which are no longer required as per the time schedule prescribed in the **Appendix A** may be destroyed.
- The details of the Documents destroyed by the Company shall be recorded/maintained in the Register wherein it shall enter brief particulars of the documents destroyed in the format prescribed at **Appendix B**.

7. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

APPENDIX A – DOCUMENTS PRESERVATION SCHEDULE

The Documents Preservation Schedule is organized as follows:

Section	Topic
A.	Corporate Records
B.	Accounts and Finance
C.	Tax Records
D.	Legal Files and papers
E.	Property Records
F.	Intellectual Property Records
G.	Insurance Records
H.	Personnel Records

A: Corporate Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
2	Common Seal	Permanent
3	Statutory Registers	Permanent
4	License and Permissions, Industrial Entrepreneurial Memorandum and other statutory approvals	Permanent
5	Statutory Forms except for routine compliance	Permanent
6	Scrutinizers Reports	Permanent
7	Register of Members	Permanent
8	Index of Members	Permanent
Documents to be retained for a minimum period of 8 years		
9	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
10	Board/Committees' meetings Notice, Agenda and supporting documents	8 years
11	Attendance Register	8 Years
12	Office copies of Notice of General Meeting and related papers	8 Years
Miscellaneous		
13	Register of Debenture-holders, if any	15 years after the redemption of debentures
14	Index of debenture-holders, if any	15 years after the redemption of debentures

B: Accounts and Finance		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Annual Audit Reports and Financial Statements	Permanent
2.	Fixed Assets Register	Permanent
3	PF, ESI returns and applicable challans	Permanent

Documents to be retained for a minimum period of 8 years		
4	Annual Plans and Budgets	8 years after completion of Audit
5	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or completion of assessment / appeals under Income Tax whichever is later
6	Bank Statements	8 years
7	Investment Records	8 years
8	Security deposit receipts copies	8 years
9	Copies of Bank Guarantees and LC documents etc.	8 years from the date of expiry
10	Loan documentations	8 years from the date of repayment.

C: Tax Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Tax Exemption and Related documents	Permanent
2	Tax Bills, receipts and payments	Permanent
3	Tax Returns	Permanent
Documents to be retained for a minimum period of 8 years		
4	Excise Records	8 years from the end of the Financial Year or completion of assessment / appeals under the applicable law is over whichever is later.
5	Tax Deducted at Source Records	8 years from the end of Financial Year or completion of assessment / appeals under the applicable law is over whichever is later.
6	Income Tax papers	8 years from the end of Financial Year or completion of assessment/ appeals under Income Tax whichever is later
7	Service Tax papers	8 years from the end of Financial Year or completion of assessment/ appeals under Service Tax whichever is later
8	Sales Tax/VAT papers	8 years from the end of Financial Year or completion of assessment/ appeals under Sales Tax whichever is later

D: Legal and Marketing Files and Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Court Orders	Permanent
Documents to be retained for a minimum period of 8 years		
2	Legal Memoranda and Opinions	8 years

3	Litigation files	8 years after disposal of the case
4	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

E: Property Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Original Purchase and Sale Agreement	Permanent
2	Property Deeds, Licenses, Rights of Way, Ownership records issued by Government Authority	Permanent
3	Property Insurance	Permanent
Documents to be retained for a minimum period of 8 years		
4	Original Lease Agreements	8 years after expiration of the lease

F: Intellectual Property Records		
Sr. No.	Records Type	Retention period
Documents to be retained permanently		
1	All licenses/permissions of trademarks, patents and copyrights	Permanent

G: Insurance Records		
Sr. No.	Records Type	Retention period
Documents to be retained permanently		
1	Insurance Policies	Permanent
Documents to be retained for a minimum period of 8 years		
2	Journal Entry support data	8 years
3	Inspections Reports	8 years
Miscellaneous		
4	Claims records	Till 8 years or till the settlement is over and claim money is received, whichever is later.
5	Group Insurance Plans	Until plan is amended or terminated.

H: Personnel Records		
Sr. No.	Records Type	Retention period
Documents to be retained permanently		
1	Payroll Registers	Permanent
2	Gratuity, Pension, Bonus, and other Statutory Records	Permanent
Documents to be retained for a minimum period of 8 years		
3	Time office/Attendance and Leave Records	8 years
4	Unclaimed Wages Records	8 years
5	Employees Information Files/Records	8 years after separation

