



DOCUMENT RETENTION AND DESTRUCTION POLICY / PRESERVATION OF DOCUMENTS POLICY

1. Policy and Purposes

This Policy represents the policy of Indo Count Industries Ltd Limited (**the Company**) with respect to the retention and destruction of documents and other records, both in hard copy and electronic media (hereinafter referred to as **“documents”**).

Purposes of the Policy include (a) retention and maintenance of documents necessary for the proper functioning of the Company as well as to comply with applicable legal requirements; (b) destruction of documents which no longer need to be retained; and (c) guidance for the Board of Directors, officers, staff and other persons with respect to their responsibilities concerning document retention and destruction. Notwithstanding the foregoing, the Company will be making the revisions / changes in the Policy from time to time depending upon the requirement.

2. Department Head (DH)

2.1 Responsibilities of the DH

Each Department Head shall be the responsible for implementation/execution of this policy in respect of his Department. His/her responsibilities shall include supervising and coordinating the retention and destruction of documents pursuant to this Policy and particularly the Document Retention Schedule included below. He/she shall also be responsible for documenting the actions taken to maintain and/or destroy documents and retaining such documentation. He/she may also modify the Document Retention Schedule from time to time as necessary to comply with prevailing Rules & Regulations/provisions of various Acts /Laws and/or to include additional or revised document categories as may be appropriate to reflect the policies and procedures.

He is also authorized to periodically review this Policy and Policy compliance with the Compliance Officer or Managing Director and to report to the Board of Directors as to compliance. He/she may depute / assign this job of carrying out his / her responsibilities, however, retaining ultimate responsibility for implementation of this Policy.

2.2 Responsibilities of other / concerned persons.

This Policy also relates to the responsibilities of board members, staff, volunteers and outsiders with respect to maintaining and documenting the storage and destruction of the Company’s documents. He shall report to the Board of Directors /committee of Directors, which maintains the ultimate direction of management.

The concerned staff familiar with this Policy, shall act in accordance therewith, and shall assist the DH, in implementing it. The responsibility of staff with respect to this Policy shall be to produce specifically identified documents upon request of management, if the staff still retains such documents. It shall be the responsibility of the DH to confirm whatever types of documents the have been retained and to request any such documents which the DH feels will be necessary for retention by the Company. Vendors, Service providers etc. may be provided with the copy of this Policy depending upon the sensitivity of the documents involved with the particular outside concern / entity requesting compliance.

3. Suspension of Document Destruction; Compliance.

The Company shall preserve the documents once litigation, an audit or any investigation is reasonably envisaged / anticipated. He/she may communicate envisaged / contemplated litigation, investigation to all DHs in writing. He may thereafter amend or rescind the order only after conferring with legal counsel. If any board member or staff member becomes aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, with respect to the Company, they shall make the concerned DH aware of it. Failure to comply with this Policy, including, particularly, disobeying any instructions could result in possible civil or criminal sanctions. In addition, for staff, it could lead to disciplinary action including possible termination.

4. Electronic Documents; Document Integrity.

Documents in electronic format shall be maintained just as hard copy or paper documents are, in accordance with the Document Retention Schedule. Due to the fact that the integrity of electronic documents, whether with respect to the ease of alteration or deletion, or otherwise, may come into question, the DH shall attempt to establish standards for document integrity, including guidelines for handling electronic files, backup procedures, archiving of documents, and regular verifications of the system; provided, that such standards shall only be implemented to the extent that they are reasonably attainable considering the resources and other priorities of the Company.

5. Privacy.

Data Privacy audit shall be conducted periodically / once in a year, by the Legal Dept. of the Company and to establish reasonable procedures for compliance and to allow for their audit and review on a regular basis.

6. Emergency Planning.

Documents shall be stored in a safe and accessible manner. Documents which are necessary for the continued operation of the Company in case of an emergency shall be regularly duplicated or backed up and maintained at a place which is outside / at remote location. The Company shall develop reasonable procedures for document retention in the case of an emergency.

7. Document Creation and Generation.

The DH shall discuss with staff the ways in which documents are created or generated. With respect to each employee or function, the DH shall attempt to determine whether documents are created which

can be easily segregated from others, so that, when it comes time to destroy or retention of those documents, they can be easily separated from the others for disposition.

8. Document Retention Schedule.

<u>Document Type</u>	<u>Retention Period</u>
Accounting	
Accounts Payable	8 years
Accounts Receivable	8 years
Annual Financial Statements and Audit Reports	16 years
Bank Statements, Reconciliations & Deposit Slips	8 years
Canceled Checks – routine	2 years
Employee/Business Expense Reports/Documents	8 years
General Ledger	16 years
Interim Financial Statements	8 years
Treasury and Finance	
Secretarial	
Memorandum and Articles of Association	Permanent
Minute Books, including Board & Committee Minutes	10 years
Annual Reports	Permanent
Corporate Filings with Stock Exchanges	10 years
Corporate Filings with Ministry of Corporate Affairs and other Regulators	10 years
Statutory Registers	As per Companies Act, 2013. In case, no period specified, 10 years
HR Department	
Employee Personnel Records	5 yrs after employment ends
Employee contracts	5 yrs after termination
Retirement and pension records	16 years
Business Development Department	
IT Dept.	
Electronic Mail (E-mail) to or from the Company	
Electronically stored documents (e.g., in pdf, scanned documents, text or other electronic format)	
Insurance	
Property, D&O, Workers' Compensation and General Liability Insurance Policies	8 years
Insurance Claims Records	8 years
Legal and Contracts	
Contracts, related correspondence and other supporting documentation	10 yrs after termination

Legal correspondence	8 years
Management Policies	
Strategic Plans	3 years
Disaster Recovery Plan	5 years
Policies and Procedures Manual	Current version with revision history for 3 yrs
Budgets and Vision Documents	3 years
Property – Real and Intellectual	
Property deeds and purchase/sale agreements	Permanent
Property Tax Receipts etc.	Permanent
Property Leases	Permanent
Trademarks, Copyrights and Patents	Permanent
Taxation	
Tax exemption documents & communications	16 years
IT Rulings / Case Laws	16 years
Annual Tax Returns	16 years
Periodical Tax returns	16 years

If any retention period of documents is specified in the applicable laws, the said retention period will be applicable. Wherever retention period is not specified and if the documents do not fall under above list, Departmental Head would decide the period of retention.
