

Subject: Policy on Preservation of documents and Archival of documents on the website “Archival Policy”	Original Issue Date: 01.12.2015	Version No.: 1.0
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**ARSS INFRASTRUCTURE PROJECTS LIMITED
(‘ARSS IPL’)**

**Policy on
Preservation of Documents
&
Archival of documents on the website
(ARCHIVAL POLICY)**

Policy on Preservation of documents and archival of the documents in the website (Pursuant to Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”))

1. INTRODUCTION

1.1 The purpose of this document is to present policy statement for ARSS Infrastructure Projects Limited (‘Company’) regarding preservation of its documents and archival of documents in the website in accordance with the provisions of the Companies Act, 2013 and Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

1.2 The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

2. PURPOSE OF THE POLICY

2.1 The policy on preservation of documents and archival is mandated by the provisions of regulation 9 of Chapter III of LODR, 2015. As per the requirement of Regulation of 30(8) of LODR, the Company shall disclose on its website all such events or information which has been disclosed to Stock Exchange(s) under LODR, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the Company, as disclosed on its website Under Chapter III of LODR, the Company has to ensure that significant documents are safeguarded and preserved including those in electronic mode.

3. DEFINITIONS

3.1 “Policy” means this Policy on preservation of documents and archival of documents in the website.

4. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

4.1 The Company’s physical and electronic documents shall be classified for the purpose of preservation as follows:

- A. Documents whose preservation shall be permanent in nature;**
- B. Documents which are to be maintained for at least eight financial years;**
- C. Documents which are to be maintained on website of the Company for a minimum period of five (5) years.**

The documents as specified in A and B above may be kept in electronic mode also.

The list of documents for the above categories is given in the Annexure.

5. RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS

5.1 All the Employees on the permanent rolls of the Company are responsible for taking into account the potential impact on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

6. DISPOSAL AND DESTRUCTION OF RECORDS

6.1 After the expiry of the statutory retention 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 both Physical and Electronic Documents. The documents may be destroyed as follows:

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

7. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

7.1 In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

8. STATUTORY REQUIREMENTS

8.1 If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

9. WEB ARCHIVAL POLICY

9.1 The Company shall disclose on its website all events or information which has been disclosed to Stock Exchange(s) and retain the same for period of five years.

9.2 At the end of five years, the information shall be archived and preserved for a further period of three years.

10. POLICY REVIEW

10.1 The Whole-Time Director of the Company is authorized to periodically review the policy and make such changes as considered necessary

ANNEXURE

A. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

The Company shall maintain the following documents on a permanent basis:

- a) Incorporation Documents;
- b) The Original Signed and Stamped Memorandum of Association and the Articles of Association of the Company;
- c) Minutes of General Meetings, Board Meetings and various Committee Meetings;
- d) Register of Members along with Index;
- e) Foreign Register of Members, if any;
- f) Register of loans, guarantee, security and acquisition made by the Company;
- g) Register of investments not held in its own name by the Company, if any;
- h) Register of contracts with related party and contracts and Bodies etc. in which directors are interested;
- i) Register of Charges;
- j) Registers of Renewed and duplicate share certificates;
- k) Register of Directors and Key Managerial Personnel;
- l) Merger Order(s) issued by Hon'ble High Court/National Company Law Tribunal;
- m) Approval(s) and Product Registration & license(s) received from Statutory Authorities, Central & State Government(s);
- n) Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently.

B. DOCUMENTS WHICH ARE TO BE MAINTAINED FOR AT LEAST EIGHT FINANCIAL YEARS:

The Company shall maintain the following documents for at least eight financial years:

- a) Books of account together with the vouchers relevant to any entry in such books of account;

- b) Register of Debenture holders (including Foreign Register of Debentures) or Register for any other Securities issued by the Company;
- c) Copies of all Annual Returns;
- d) E-forms filed with the Registrar of Companies;
- e) Disclosure of Interest received from the Directors of the Company in the manner prescribed;
- f) Attendance Registers, Notices, Agenda, Notes on Agenda and other related papers of General Meetings, Board Meetings and various Committee Meetings;
- g) Instrument creating a Charge or modifying a Charge, if any;
- h) Changes to the Memorandum of Association and the Articles of Association, if any;
- i) Register of deposits accepted or renewed, if any;
- j) Tax Records - Tax records including, but not limited to documents concerning tax assessment, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax Authorities, shall be maintained for a period of 8 years or for a period of 8 years after a final Order has been received with respect to any matter which was preferred for appeal, as the case may be;
- k) Employment /Personnel Record should be retained for a period of eight (8) years following cessation of employment in case of employees of the Company;
- l) Relevant marketing and sales documents;
- m) Bank Statements and vouchers;
- n) Filings with Stock Exchanges and other statutory authorities;
- o) Corporate Social Responsibility Records;
- p) Sponsorship Projects Records;
- q) Correspondence and Internal Memoranda;
- r) Security Deposit Receipts (after receipt of deposit money back);
- s) Tender Documents;
- t) Lease Deeds and Contracts;
- u) Insurance Records including policies and claims;
- v) All e-mail correspondence, internal & external;
- w) Legal documents / files including but not limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters
- x) Any other record as may be decided by the Managing Director of the Company from time to time;

C. DOCUMENTS WHICH ARE TO BE MAINTAINED ON WEBSITE OF THE COMPANY FOR A MINIMUM PERIOD OF FIVE (5) YEARS:

- a) Disclosure of all events and information provided to the Stock Exchanges as per the Listing Regulations;
- b) Investor Presentation and audio video recordings/transcripts of investor calls;
- c) Press Release.

The above documents as uploaded on the Company's website will be archived for a period of three (3) years and thereby destroyed as per this Policy.
