



Policy on Preservation of Documents

PREAMBLE

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ["Regulations"] requires every listed company to have a policy on Preservation of Documents either in Physical Mode or Electronic Mode.

In any circumstance, where the terms of this policy differ 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.

SCOPE

The scope of this Policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same.

OBJECTIVES

The main objective of this policy is to ensure that all the statutory documents are preserved in compliance with the Regulations.

The major objectives in view of the preservation of documents are:

- ✓ Company's own information retrieval needs (reference value)
- ✓ Statutory requirements under respective statutes
- ✓ Litigation requirements
- ✓ To ensure easy retrieval
- ✓ To ensure that unwanted records do not occupy storage space.

DEFINITION

In this policy unless the context otherwise requires

“Act” means the Companies Act, 2013 and rules made there under, as amended from time to time

“SEBI Regulations” shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as may be amended from time to time

“Company” means Capital Trust Limited

“Document” includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form

“Key Managerial Personnel” or **“KMP”** shall have the same meaning ascribed to it under the Act

“Board” or **“Board of Directors”** shall mean the Board of Directors of Hindustan Construction Company Limited, as may be re-constituted from time to time

“Financial Year” shall have the same meaning as prescribed to it under the Companies Act, 2013

“Electronic Form” with reference to information means any information generated, sent, received or stored in media, magnetic, optical, computer memory, micro film, computer generated micro fiche or similar device.

“Electronic Records” means the electronic records as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000.

The words or expressions used but not defined herein, but defined under Companies Act, 2013 or the SEBI Regulations shall have the same meaning assigned therein.

RESPONSIBILITY

The departmental head concerned will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department. The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

MODE OF PRESERVATION

Records/documents may be preserved either physically or in electronic form.

DESTRUCTION OF RECORDS

The documents of the Company which are no longer required as per the time schedule prescribed in the Annexure A may be destroyed. The concerned officer may direct employees in charge from time to time to destroy the documents which are no longer required as per the documents Preservation Schedule given under Annexure A. The details of the documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the documents in the format prescribed at Annexure B. The entries in the register shall be authenticated by the Authorised Person.

GENERAL AUTHORISATION

The Policy shall be reviewed on a periodic basis and the Chairman and Managing Director / Whole-time Directors and Company Secretary are authorized severally to make such changes as may be deemed necessary or as warranted by law.

AMENDMENT

The Board shall have power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this policy entirely with a new Policy according to subsequent modification(s) / amendment(s) to Regulations.

ANNEXURE – A

DOCUMENTS PRESERVATION SCHEDULE

Indicative List

PERMANENT PRESERVATION:

- ✓ Common Seal,
- ✓ Minutes books of Board, General Meetings and Committee Meetings,
- ✓ Statutory Registers,
- ✓ Statutory Forms except for routine compliance,
- ✓ License and Permissions,
- ✓ Scrutinizer's Report,
- ✓ Annual Audit Reports and Financial Statements
- ✓ Register of Members and
- ✓ Index of Members.

TEMPORARY PRESERVATION UPTO 8 YEARS:

- ✓ Annual Returns,
- ✓ Board Agenda and supporting documents,
- ✓ Attendance Register,
- ✓ Office copies of Notice of General Meeting and related papers,
- ✓ Office copies of Notice of Board Meeting / Committee Meeting, Notes on Agenda and other related papers,
- ✓ All notices pertaining to disclosure of interest of directors,
- ✓ Instrument creating a charge or modification,
- ✓ Books of accounts, financial statements etc. and
- ✓ Register of debenture holders or any other security holders.

Others

Including Tax records, Finance records, Insurance Records, Employee Records as and when required should be preserved according to the internal norms of the Organization.

ANNEXURE - B

Specimen format of the register of documents disposed-off / destroyed

Serial No.	Particulars of Documents along with provision of Law	Date and Mode of Destruction	Initials of the Authorised Person
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