

Policy on Preservation of Documents

(In terms of Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015)

Objective

The SEBI vide SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015) has mandated all the listed Companies to frame a Policy for Preservation of Documents as approved by the Board of Directors.

Purpose

This Policy is framed for Preservation of Documents of Tata Elxsi Limited in hard and electronic media in good stead.

Administrator

The Administrator of this Policy shall be the Managing Director/CFO/CS/Vice Presidents. Their responsibilities are supervising the preservation of documents as per the Schedule herein mentioned below. The Administrator may modify and review the Document Preservation Schedule to comply with law and organizational policies.

Electronic documents

The Administrator attempts to establish standards for document integrity, including guidelines for handling electronic files, backups, archiving documents, and checking the reliability of the system.

Classification of Documents

The documents or register that need to be preserved are classified into the following categories:

1. Documents to preserve permanently (Category –I)
2. Documents to preserve for 8 years (Category – II)
3. Documents to preserve for a period less than 8 years (Category – III)

Responsibility

All employees of the Company are equally responsible to for taking appropriate action and judgement in preserving the documents under the policy.

This Policy is approved by the Board of Directors at their meeting held on 4th January, 2016 with the authority to the Managing Director to make necessary amendment, if any, as per the requirement of the applicable statute or as per the changing requirement of the business operations. However any major amendment with the respect to reduction of preservation period would require specific approval of the Board.

DOCUMENTS TO BE PRESERVED PEREMANENTLY (Category-I)			
Sr.No	Section/Rules	Description of document	Time upto which document to be preserved
1	Section 186(9) & rule 12(1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Registers of loans, guarantee, security and acquisition made by the Company	Permanently
2	Section 187(3) and rule 14(1) of the Companies (Meetings of Board and its Powers) Rules, 2014.	Register of investments not held in its own name by the Company	Permanently
3	Section 189 (1) and rule 16 (1) of the Companies (Meetings of Board and its Powers) Rules, 2014	Register of contracts with related party and contracts and Bodies etc, in which directors are interested	Permanently
4	Section 85 & the Companies (Registration of Charges) Rules, 2014	Register of Charges	Permanently
5	Section 88 & the Companies (Management and Administration) Rules, 2014	Register of Members including an index of the names	Permanently
6	Section 88 & the Companies (Management and Administration) Rules, 2014	Foreign register of members	Permanently
7	Rule 25 of the Companies (Management and Administration) Rules, 2014	Minutes of General Meetings	Permanently
8	Rule 25 of the Companies (Management and Administration) Rules, 2014	Minutes of the Board and Committee Meetings	Permanently
9	Rule 18 of the Companies (Share Capital and Debentures) Rules, 2014	Debenture trust deed	Permanently
10	Rule 6 (3) of the Companies (Share Capital and Debentures) Rules,2014	Register of Renewed and Duplicate Share Certificates	Permanently
11	Rule 7 of the Companies (Share Capital and Debentures) Rules,2014	All books and documents relating to the issue of share certificates, including the blank forms of share certificates	not less than thirty years and in case of disputed cases, shall be preserved permanently.
12		Minutes of Provident, Superannuation and Gratuity Fund Trusts	Permanently
13		Claim Files (Including correspondence, medical records, injury documentation, etc.	Permanently
14		Releases and Settlements	Permanently
15		Annual Information Returns – State and Central	Permanently
16		Licences and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanently

17		Court Orders	Permanently
18		Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanently
19		Original Purchase / Sale Deeds	Permanently
20		Records on CSR Projects(including amount budgeted, spent and balance if any) projects undertaken and progress thereon	Permanently
21		Annual Reports	Permanently
DOCUMENTS TO BE PRESERVED FOR A PERIOD OF 8 YEARS or above (Category-II)			
22	Section 88 & the Companies (Management and Administration) Rules, 2014	Annual return and copies of all certificates and documents required to be annexed thereto	Preserved for a period of eight years from the date filing the Registrar
23	Section 88 & the Companies (Management and Administration) Rules, 2014	Foreign register of debenture-holder	Preserved for a period of eight years from the date redemption of such debentures
24	Section 88 & the Companies (Management and Administration) Rules, 2014	Register of debenture-holders including an index of the names	Preserved for a period of eight years from the date redemption of debentures or securities , as the case may be
25	Section 73&the Companies (Acceptance of Deposits) Rules, 2014	Registers of deposits	For a period of not less than eight years from the financial year in which the latest entry is made in the register
26	The Companies (Meetings of Board and its Powers) Rules, 2014.	Disclosures/ Notices by a director of his interest	For a period of eight years from the end of the financial year to which it relates
27	128(5)	Books of Accounts including vouchers relevant to any entry in such books of account	8 financial years preceding current FY
28		Group Insurance Plans & Policies	For a period of eight years
29		Accounts payable & receivable ledgers and schedules	For a period of eight years
30		Bank Statement and Cancelled Cheques	For a period of eight years
31		Employee Expense Reports	For a period of eight years
32		Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents	For a period of eight years
33		Employee Records	15 years from the year of resignation/retirement
DOCUMENTS TO PRESERVED FOR A PERIOD OF LESS THAN 8 YEARS (Category-III)			
34	Rule 7(3) of the Companies (Share Capital and Debentures) Rules, 2014	All certificates surrendered to a company shall immediately defaced by stamping or printing the word "cancelled" in bold letters	May be destroyed after the expiry of three years from the date on which they are surrendered,
35		ROC Filings and Stock Exchange filings in physical and Electronic form	5 years from the date of filing

36		Annual plans & budgets	3 years after the budget year is closed
37		Legal Memoranda and Opinions	3 years after the closure of the matter
38		Original Lease Agreements	3 years after expiration of the lease
39		Litigation files	1 year after expiration of disposal of the case

Archival Policy

The disclosures as made by the company and uploaded in its Website shall be retained in the Webpage for a period of 5 years and thereafter the same may be archived and kept for a period for a period of 1 year thereafter.

Suspension of document destruction

TEL has a duty to preserve documents when litigation, an audit or a government investigation is anticipated. During that period the documents shall be retained till the disposal of litigation, audit or investigation as the case may be.

Destruction of Documents

All the documents retained as per the above schedule and on expiry of the relevant period shall be destroyed by way of shredding. There shall be maintained a register to record the destruction of documents and duly initialled by the respective head of the departments whose respective department's documents are destroyed.

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