



ASM Technologies Limited

POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS

{Pursuant to SEBI (Listing Obligations and Disclosure Requirements), 2015}

1. Introduction

The “Policy on Preservation and Archival of Documents” is required to be framed in accordance with Regulation 9,30(8) and other applicable Regulations of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and Companies Act 2013.

2. Purpose of the Policy:

The Company has formulated this policy on preservation of the documents to aid the top management and other employees of the Company in handling the documents efficiently. It not only covers the various aspects on preservation of the documents, but also the archival, safe disposal and destruction of the documents.

Regulation 9 of the Listing Regulations mandates that a listed entity shall have a policy for preservation of documents, approved by its Board of directors, classifying them in at least two categories as follows-

- a. Documents whose preservation shall be permanent in nature:

The Documents of a permanent nature shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- b. Documents with a preservation period of not less than eight years after completion of the relevant transactions

The Documents to be maintained and preserved for a specified time period after completion of the relevant transactions, shall be preserved by the Company for the term not less than 8 (eight) years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for the aforesaid term of 8 (eight) years.

Further Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 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.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time.

3. Policy

- Preservation of documents

(A) Preservation of Documents with specific reference to the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

1. Documents whose preservation shall be permanent in nature :

All those documents which are required to be preserved permanently in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. as may be applicable on the Company from time-to-time shall be preserved permanently. Details of documents whose preservation shall be permanent in nature is annexed.

2. Documents with preservation period of not less than eight years after completion of the relevant transactions :

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for a period of not less than eight years after completion of the relevant transactions shall be preserved accordingly. Details of documents with preservation period of not less than eight years after completion of the relevant transactions is listed in annexed.

3. Documents with preservation period other than those mentioned in (2) above :

All those documents which are required to be preserved in accordance with the provisions of applicable Act, Rules, Regulations, Guidelines, Circulars, Notifications etc. for period other than those mentioned in 1 & 2 above shall be preserved accordingly.

(B) Documents to be made available on the website of the Company as required by the Companies Act, 2013 and the Listing Regulations

1. The Company is to maintain a functional website containing

- the basic information about the Company,
- all Information and/or documents as specified in the applicable provisions of Companies Act, 2013,
- all Information and/or documents as specified in Regulation 46 (2) and Regulation 30 of the SEBI (LODR) Regulations 2015,
- all other Information and/or documents as required under SEBI (LODR) Regulations

2015.

2. The Company shall ensure that contents of the website are correct.
3. The Company shall update any change in the content of its website within two working days from the date of such change in content.
4. Information and/ or Documents that need to be made available under Regulation 30 of the Listing Regulations shall be made available on the website simultaneously with disclosure to Stock Exchanges.
5. The information and/or documents uploaded on the website shall be available for current financial year and for the preceding five financial years.

4. Archival of documents:

Documents made available on the website of the company:

After the expiry of time mentioned in Clause 3 (B) of this policy (i.e. five financial years preceding the current financial year), the information and/or document shall be removed from the main website. The Backup of said information and/or document which is removed from the main website shall be archived / preserved in the server for a minimum period of 3 years and after expiry of this period of 3 years the backup may be permanently removed from the server.

5. Destruction of Documents:

- a) Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both Physical and Electronic Documents.
- b) After the expiry of the preservation period specified in applicable laws/ regulations, such documents which are no longer required may be destroyed by the person in whose custody the documents are preserved, after obtaining prior approval of Chief Financial Officer/Company Secretary of the Company. The records of the documents destroyed shall be maintained by the concerned department and shall be produced whenever required by the concerned authority/auditors.
- c) In case any specific procedure is prescribed under applicable Act/Rule/Regulation for destruction of the documents, the same shall be followed by the Company.
- d) Where the Company has been served with any Notice requisitioning documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed off finally.

The Company shall maintain a register of disposal of records in the custody of the respective departments of the Company, wherein the brief particulars of the records disposed of shall be entered like,

- a) Item Number;
- b) Brief Particulars of the records disposed of;
- c) Date of approval for disposal of records;
- d) Date of disposal; and
- e) Mode of destruction

. This register of disposal of records shall be maintained permanently by the Company with the assistance of the Compliance Officer either in physical or electronic form.

Method of disposal-

- Documents should be destroyed on site, using the shredders.
- steps should be taken to make data virtually impossible to retrieve;
- wherever practicable, disposal should further aid recycling, in-line with the Company's commitment to sustainable development and promoting an alternative waste disposal strategy.

Amendments and updates

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time.

Type of Record

1. Accounting and Finance records including Annual Financial statements
2. Tax records
3. Contracts entered into by the Company including Business Contracts
4. Corporate Records including Certificate of Incorporation, Listing Regulations and other approvals from other statutory authorities
5. Legal Files and Records
6. Property Records
7. Payroll Records /Personnel and HR Records
8. Electronic Documents including email retention and back up

1. ACCOUNTING AND FINANCE RECORDS INCLUDING ANNUAL FINANCIAL STATEMENTS

Record Type	Retention Period	Responsibility
Accounts Payable ledgers and schedules - in system	8 Years	Finance and Accounts Department
Accounts Receivable ledgers and schedules- in system	8 Years	
Annual Audit Reports and Financial Statements	Permanent	
Annual Audit Records, including work papers and other documents related to audit	8 years after completion	
Bank Statement and Cancelled Cheques	8 years	
Employee Expense Reports	8 years	
General Ledger	Permanent	
Interim Financial Statements	8 years	
Notes Receivable ledgers and schedules	8 years	
Investment Records	Permanent	
Security deposit receipt copies	8 years after termination of contract	
Inventory ledger & inventory related documents (in system)	8 Years / 3 years (hard copies)	
Purchase day book in system	8 Years	
Sales day book in system	8 Years	
Cash book & related documents	8 Years / 3 years (hard copies)	
Fixed assets register in system	8 Years	
Land documents - sale / purchase deeds	Permanent	

2. TAX RECORDS

Record Type	Retention Period	Responsibility
Tax-Exemption Documents and related correspondence	8 years	Finance And Accounts Department
Annual Information Returns – State and Central	Permanent	
Tax workpaper - Originals	8 years	
Sales Tax Records	8 years	
Service Tax Records	8 years	
Tribunal Rulings	8 years	
Income Tax Documents	Permanent	

3. CONTRACTS ENTERED INTO BY THE COMPANY INCLUDING BUSINESS CONTRACTS

Record Type	Retention Period	Responsibility
Agreements /Contracts and Related Correspondence	Permanent	Business Development

4. CORPORATE RECORDS INCLUDING CERTIFICATE OF INCORPORATION, LISTING REGULATIONS AND OTHER APPROVALS FROM OTHER STATUTORY AUTHORITIES

Record Type	Retention Period	Responsibility
Corporate Records (certificate of incorporation, commencement of business, listing regulations, common seal, minutes book of board and committees thereof, annual reports originals, etc)	Permanent	Secretarial Department
License and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanent	
ROC Filings and Stock Exchange filings in Disclosure/Return filed under SEBI (Listing Obligation and Disclosure requirements) Regulations, 2015	Permanent	
Disclosure / Returns filed with Ministry of Corporate Affairs	Permanent	
Register /Index of members	Permanent	
Transfer & Transmission of shares and related documents	Permanent	
Bylaws and Amendments	Permanent (current version with revision history)	
Postal Ballot/voting slips	8 years	
Attendance Register& Proxies of AGM	8 years	
Policies and Procedures	Permanent	

5. LEGAL FILES AND RECORDS

Record Type	Retention Period	Responsibility
Legal Memoranda and Opinions	8 years	Finance And Accounts Department
Court Orders	Permanent	
Trademarks, Copyrights, Licenses, etc.	Permanent	
Other related records	Permanent	

6. PROPERTY RECORDS

Record Type	Retention Period	Responsibility
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent	Finance And Accounts Department/ Administration Department
Original Purchase / Sale Deeds	Permanent	
Original Lease Agreements	8 years after expiration of the lease	

7. PAYROLL RECORDS

Record Type	Retention Period	Responsibility
Employee Deduction Authorization	8 years after termination of service of employment	HR Department
Payroll Deductions including PF		
Labour Distribution Cost Records including details regarding gratuity and retiral Disbursements		
Payroll Registers (Gross and Net)		
Time Cards / Sheets	8 years	
Leave Records	8 years after the relevant period	

PERSONNEL RECORDS

Record Type	Retention Period	Responsibility
Personnel Files of individual employees	Permanent	HR Department
Commission / Bonuses / Incentives / Awards	Permanent	
Employee Earnings Records	Permanent	
Attendance registers / records	Permanent	
Employee Medical Records	Permanent	
Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers	Permanent	
Employment Contracts - Individual	Permanent	
Employee Handbook & Induction Manual		
Correspondence with Employment Agencies and Advertisements for job openings	8 years	
Insurance Policies for the Company	Permanent	
Releases and Settlements	Permanent	

8. ELECTRONIC DOCUMENT INCLUDING EMAIL RETENTION AND BACK UP

Electronic Mail: Not all email needs to be retained, depending on the subject matters

- All e-mails – from internal and external sources to be archived according to the space constraint provided to the employee.
- Staff will strive to keep all emails related to business issues
- Staff will not store or transfer the Company related emails on non-work related computers.
- Staff will take care not to send confidential / proprietary information to outside sources
- Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employees' workplace