

GOBIND SUGAR MILLS LIMITED

POLICY ON PRESERVATION AND ARCHIVAL OF DOCUMENTS

1. Purpose and Scope

The purpose of this Policy is to ensure that necessary records and documents of Gobind Sugar Mills Limited (the Company) are adequately preserved and maintained in accordance with the provisions of the Companies Act, 2013 and provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR, 2015”).

The corporate records of the Company and its subsidiaries/Joint Ventures are important assets. Corporate records include essentially all records produced by the Company whether paper or electronic as a statutory requirement or otherwise. A record may be as obvious as a memorandum, an e-mail, a contract or a case study, or something not as obvious, such as a computerized desk calendar, an appointment book or an expense record.

This Policy identifies the record retention responsibilities of employees, Senior Management, Board of Directors of the Company for maintaining and documenting the preservation and disposal of the Company’s documents and record. It sets guidelines and facilitates Company’s fulfillment of the duty of care, establishes transparency and ensures compliance.

The policy on preservation of documents and archival is mandated by the provisions of regulation 9 of Chapter III of LODR, 2015. Under this regulation, the Company has a strategic objective of ensuring that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources and ensure that records that are no longer needed are discarded/disposed at the proper time.

This policy has been adopted and approved by the Board of Directors at its meeting held on 28th October, 2015.

2. Principle Of Responsibility Of Employees For Preservation Of Documents

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company’s employees would immensely help company’s litigation preparedness tool helping the Company’s and Outside legal counsel to track down documents to handle the legal cases.

3. Administration

The Record Retention Schedule approved by the Board of Directors for initial maintenance, retention and disposal schedule for records is as given in the annexure.

4. Suspension of Record Disposal in the event of Litigation or Claims

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, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise.

5. Classification of Documents to be preserved / retained

- ❖ Documents that need to be preserved / retained permanently – **Category A**
- ❖ Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR – **Category B**
- ❖ Documents to be preserved electronically and archived when necessary– **Category C.**
- ❖ Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case – **Category D.**
- ❖ Emails of all employees in the grade M3 (E6) and above for a period of 3 years – **Category E.**
- ❖ Documents like budget papers etc., which may be retained for less than 8 years – **Category F.**

APPENDIX

Type of Record

1. Accounting and Finance records including Annual Financial statement
2. Insurance Records
3. Tax records
4. Contracts entered into by the Company including Marketing Contracts
5. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities.
6. Legal Files and Records
7. Property Records
8. Payroll Records
9. Pension and retiral related Records
10. Personnel and HR Records
11. Programs & Service Records
12. Sponsorship Projects Records
13. Corporate Social Responsibility Records
14. Correspondence and Internal Memoranda
15. Electronic Documents including email retention and back up
16. Miscellaneous Records

1. Accounting and Finance records including Annual Financial statement (Finance and Accounts Department)

Record Type	Retention Period	Category
Accounts Payable ledgers and schedules	8 Years	B
Accounts Receivable ledgers and schedules	8 Years	B
Annual Audit Reports and Financial Statements	Permanent	A
Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit	B
Annual Plans and Budgets	3 years after the budget year is closed	F
Bank Statement and Cancelled Cheques	8 years	B
Employee Expense Reports	8 years	B
General Ledger	Permanent	A
Interim Financial Statements	8 years	B
Notes Receivable ledgers and schedules	8 years	B
Investment Records	Permanent	A
Security deposit receipt copies	3 years after termination of the contract	F

2. Insurance Records (Finance and Accounts Department)

Record Type	Retention Period	Category
Annual Loss Summaries	8 Years	B
Audits and Adjustments	8 Years	B
Claim Files (Including correspondence, medical records, injury documentation, etc.	Permanent	A
Group Insurance Plans – Active Employees	8 years	B
Group Insurance Plans - Retireees	Permanent	A
Insurance Policies for the Company	Permanent	A
Journal Entry Support Data	8 years	B
Releases and Settlements	Permanent	A

3. Tax records (FINANCE AND ACCOUNTS DEPARTMENT)

Record Type	Retention Period	Category
Tax-Exemption Documents and related correspondence	Permanent	A
Excise Tax records	Permanent	A
Payroll Tax records	8 years	B
Tax Bills, Receipts, Statements	8 years	B
Tax Returns – Income, Franchise, Property	Permanent	A
Tax workpaper packages - Originals	8 years	B
Sales Tax Records	8 years	B
Annual Information Returns – State and Central	Permanent	A
Service Tax Records	8 years	A

4. Contracts entered into by the Company including Marketing Records (Legal and Marketing Department)

Record Type	Retention Period	Category
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents)	8 years	B

5. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities. (Legal and Secretarial Department)

Record Type	Retention Period	Category
Corporate Records (certificate of incorporation, commencement of business, listing agreement, common seal, minutes book of board and committees thereof, annual reports originals, etc.)	Permanent	A
Licence and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanent	A
ROC Filings and Stock Exchange filings in physical and Electronic form	5 years from the date of filing	F

6. Legal Files and Records. (Legal and Secretarial Department)

Record Type	Retention Period	Category
Legal Memoranda and Opinions	3 years after the closure of the matter	D
Litigation files	1 year after expiration of disposal of the case	D
Court Orders	Permanent	A

7. Property Records. (Legal and Secretarial Department)

Record Type	Retention Period	Category
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent	A
Original Purchase / Sale Deeds	Permanent	A
Original Lease Agreements	3 years after expiration of the lease	F

8. Payroll Records (Human Resources Department)

Record Type	Retention Period	Category
Employee Deduction Authorization	3 years after termination of service of employment	F
Payroll Deductions	3 years after termination of service of employment	F
Labour Distribution Cost Records including details regarding gratuity and retiral disbursements	3 years after termination of service of employment	F
Payroll Registers (Gross and Net)	3 years after termination of service of employment	F
Time Cards / Sheets	2 years	F
Unclaimed Wage Records	3 years	F
Leave Records	2 years after the relevant period	F

9. Pension and retiral related Records (Human Resources Department)

Record Type	Retention Period	Category
Retirement and Pension Records	Permanent	A

10. Personnel and HR Records (Human Resources Department)

Record Type	Retention Period	Category
Personnel Files of individual employees	Permanent	A
Commission / Bonuses / Incentives / Awards	8 years	B
Employee Earnings Records	3 years after termination of service of employment	F
Employee Handbook & Induction Manual	Permanent	A
Employee Medical Records	3 years after termination of service of employment	F
Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers	3 years after termination of service of employment	F
Employment Contracts - Individual	3 years after termination of service of employment	F
Correspondence with Employment Agencies and Advertisements for job openings	3 years	F
Job Description	3 years after superseding the earlier document	F

11. Programs & Service Records (Human Resources Department)

Record Type	Retention Period	Category
Attendance Records	3 years	F
Program statistics, etc,	3 years	F
Research & Publications	Permanent	A

12. Sponsorship Projects Records (Human Resources Department)

Record Type	Retention Period	Category
Sponsorship agreements	Permanent	A

13. Corporate Social Responsibility Records (Human Resources Department)

Record Type	Retention Period	Category
Records on CSR Projects(including amount budgeted, spent and balance if any) projects undertaken and progress thereon	Permanent	A

14. Correspondence and Internal Memoranda (Respective Department)

General Principle :Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract

1. Those pertaining to routine matters and having no significant, lasting consequences should be discarded within two years.
2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

15. Electronic Documents including email retention and back up (Information Technology Department)

1. **Electronic Mail : Not all email needs to be retained, depending on the subject matters (Category E)**
 - All e-mail – from internal and external sources to be deleted after 24 months.
 - Staff will strive to keep all but an insignificant minority of their email related to business issues.
 - Central I.T team would archive email for six months after the staff has deleted it after which time the email will be permanently deleted.
 - Staff will not store or transfer the Company related emails on non-work related computers except as necessary or appropriate with due approvals from the Central IT team and the respective Managers.
 - 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.

2. Electronic Documents including PDF files. (Category C)

- PDF documents – Can be a maximum period of 8 years. But the said document may be destroyed depending upon the completion of the job or its use coming to an end.
- Text/ Formatted files : All word / excel / Power point files may be deleted once every year depending on the importance or lack of it.

3. Web page files (Category C)

- May be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.
- May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial period of five years of live page.

16. Miscellaneous Records (Human Resources Department)

Record Type	Retention Period	Category
Consultant Reports	3 years	F
Policy and procedures manuals – Original	Current version with revision history	F
Policies and procedures manuals - Copies	Retain current version only	F
Dealership agreements	Current version with revision history	F
Annual Reports	Permanent	F