

ANSAL HOUSING & CONSTRUCTION LIMITED

DRAFT POLICY

ON

PRESERVATION OF DOCUMENTS

AND

ARCHIVE



1. Introduction

Pursuant to regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), every Listed Company shall frame a policy for preservation of records.

This policy inter alia provides for preservation of documents where such preservation shall be of permanent nature as also documents with preservation period of not less than eight years after completion of the relevant transactions to which such document relates.

2. Preservation of Documents / Records

The retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors as the overseeing authorities deem fit.

- a. Tax & Accounting Records:** Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, TDS returns, Service Tax and Income Tax Returns and other documents concerning the Company's revenues and expenses including capital expenditure. Tax records should be retained for at least eight years from the date of filing the applicable return or such period of time as prescribed under Tax laws whichever is later.
- b. Employment Records/Personnel Records:** Several Central & State statutes require the Company to keep certain recruitment, employment and personnel information. The Company should also keep personnel files that reflect performance reviews and any complaints brought against the Company or individual employees under applicable Central & State statutes. The Company should also keep all final memorandum and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file and all the documents relating to various funds like EPF and gratuity. Employment and personnel records should be retained for six years or till the cessation of employment of an employee or such period of time as prescribed under Tax laws whichever is later.
- c. Financial Statements, Minutes, Statutory Registers & other Documents.** Financial Statements including but not limited to Audit Reports, Journal, Ledgers, Vouchers, Books of Accounts, Minutes of Meetings of Board, Members and other Committees Meetings along with Statutory Registers as prescribed under governing laws for time being in force shall be preserved for such period as provided in respective laws. Any document where preservation period is not prescribed under governing laws shall be preserved for a minimum period of eight years.
- d. Press Releases/Public Filings.** The Company should retain copies of all press releases and documents filed with Stock Exchanges, Registrar of Companies and other regulatory authorities on a permanent basis.
- e. Legal Files / documents:** All legal documents / copies of notices / summons / orders / judgments and all other legal documents shall be preserved permanently. Documents like Leases, Leave & License Agreements and other agreements shall be preserved for at least

5 years beyond the life of the said documents or as per the terms and conditions of the agreement.

f. Development/Intellectual Property and Trade Secrets: Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to the Company and are protected as a trade secret where the Company:

- i. Derives independent economic value from the secrecy of the information; and
- ii. The Company has taken affirmative steps to keep the information confidential.

The Company should keep all documents designated as containing trade secret information for at least the life of the trade secret.

g. Contracts: Final, execution copies of all contracts entered into by the Company should be retained. The Company should retain copies of the final contracts for at least five years beyond the life of the agreement, and longer in the case of publicly filed contracts.

3. **Archive**

The events or information which has been disclosed by the Company to the Stock Exchange(s) under Regulation 30 of the new Regulations will be hosted on the website of the Company for a period of five years from date of its initial posting/ hosting. These disclosures may be removed / deleted from the website after expiry of five years from the aforementioned date.

4. **Roles & Responsibilities**

The respective Departmental Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy and shall provide a certificate to the Company Secretary of the Company annually in this regard.

5. **Amendments to the Policy**

The Board of Directors can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.