

POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS

FINOLEX CABLES LIMITED

**Registered Office: 26 - 27, Mumbai - Pune Road
Pimpri
Pune - 411 018.**

1. PREAMBLE AND LEGAL FRAMEWORK

- 1.1 In accordance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the '**Listing Regulations**'), Finolex Cables Limited (the '**Company**') has framed a policy for preservation of its documents (this '**Policy**'). This Policy will also serve as an archival policy of the Company in line with the requirements of Regulation 30 (8) of the Listing Regulations.
- 1.2 This Policy will be the guiding document for the Company for the preservation, archival and destruction of data, documents, writings, correspondences, invoices, challans, registers, records whether on paper or in electronic mode.
- 1.3 The Board of Directors of the Company (the '**Board**'), at its meeting held on 10th February, 2016, has approved this Policy in compliance with the regulatory requirements.
- 1.4 This Policy will be effective from 1st December, 2015 and shall include all documents listed in the Document Retention Schedule (Annexure Attached) that are in existence as on that date.

2. SCOPE AND PURPOSE

- 2.1 This Policy covers all forms of paper and electronically stored information generated in the nature of official records of the Company, including but not limited to all
 - (1) typed or printed hard copy (paper) documents;
 - (2) electronic records and documents such as electronic mail, web files, text files, PDF files;
 - (3) graphic representations in the nature of graphs, images, charts, models;
 - (4) electronically stored information contained on network servers and / or document management systems.
- 2.2 Information located in remote offices or at any other offsite location is subject to this Policy and will be managed consistently with this Policy.
- 2.3 This Policy is intended to guide the Company on the maintenance of any documents, their preservation, archival and disposal.
- 2.4 The objectives of this Policy are to ensure that :

- (1) applicable laws and regulations necessitating the preservation, archival of documents or retention of records for the period specified therein are duly complied with;
- (2) records necessary for analytical and business reasons are retained for a period of time that will reasonably assure their availability when needed;
- (3) necessary records and documents of the Company, whether in physical form or in electronic mode, are adequately protected and maintained in alignment with applicable laws and regulations and policies and procedures;
- (4) records that are no longer needed by the Company for legal or business reasons are systematically discarded at the proper time;
- (5) confidentiality and security of records is preserved;
- (6) documents that may need to be retained in specific circumstances such as threatened litigation or government investigation are preserved;
- (7) guidelines are put in place for the systematic management, maintenance, review, retention and orderly disposition of documents received or created by the Company in connection with the transaction of the business of the Company for legal, historical and business purposes;
- (8) the operations of the Company are conducted with ease by promoting efficiency and freeing up valuable storage space.

3. ADMINISTRATION

3.1 The Board has appointed the Executive Director & Chief Financial Officer as the Chief Records Administrator for the purpose of:

- (1) administering this Policy; and
- (2) implementing reasonable processes and procedures concerning the Document Retention Schedule.

The respective Plant/Unit Head and respective Branch Head shall be responsible for the purposes set out at 3.1 above in respect of their respective Plant/Unit or Branch under the overall supervision and control of the Chief Records Administrator.

3.2 Authority and Responsibility of the Chief Records Administrator

The Chief Records Administrator will be authorised to :

- (1) make modifications to the Document Retention Schedule from time to time to ensure that this Policy complies with the applicable laws and includes the appropriate document and record categories for the Company;

- (2) monitor applicable laws affecting disposal and retention of documents;
- (3) annually review the record retention and disposal program of the Company, develop procedures for destroying categories of documents or archiving documents with a view to facilitating the efficient administration of the Company's operations.

4. PRESERVATION OF DOCUMENTS

- 4.1 A 'Document Retention Schedule' annexed to this Policy has been approved by the Board as the initial maintenance, retention and disposal schedule for the documents of the Company indicative of the time-frame for their preservation.
- 4.2 The documents may be preserved in physical form or electronic form.
- 4.3 For ease of reference of records, the documents will be preserved in an indexed form. The documents will be indexed appropriately as per the advise in this regard given by the Chief Records Administrator. The index will be updated as and when any changes occur in the records or as deemed appropriate by the Chief Records Administrator.
- 4.4 The preservation of documents will be in such a manner so as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.

5 CUSTODY AND STORAGE OF DOCUMENTS

- 5.1 The ultimate custody of the documents will be with the Chief Records Administrator. Where the Chief Records Administrator or any concerned employee tenders his resignation or is transferred from one location of the Company to another, the Chief Records Administrator will arrange for the proper hand over of all the relevant documents, lock and key, access control or password, or Company Disc, other storage devices or such other documents and devices in his possession or in the possession of respective Plant/Unit Head or respective Branch Head or other concerned employee under this Policy to the new Chief Records Administrator or Plant or Unit Head or Branch Manager or as may be advised by the Executive Chairman of the Company.
- 5.2 Documents that are ready to be put in storage, based on the attached Document Retention Schedule annexed to this Policy, should be kept in the designated areas until the time that they are archived or disposed of.
- 5.3 Documents must be labelled using the procedures in effect at the time of storage, which will include, but are not limited to the subject, date, department and disposition or archiving date.
- 5.4 Documents collected by the staff of the Company which do not affect the activities of the Company nor pertain to any confidential matter of the Company are considered personal items

if they relate to personal affairs. Such materials are considered private property and are not owned by the Company. They should be kept elsewhere and separate from documents of the Company.

6 DESTRUCTION OF DOCUMENTS

6.1 Destruction as a normal administrative practice may be resorted to where the records are duplicated, obsolete, unimportant or for short-term use only. This applies to both physical documents and documents maintained in electronic form.

6.2 The temporary documents, excluding the documents having any ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter will be authorised, in writing, for destruction after the relevant or prescribed period, by the Chief Records Administrator in whose ultimate custody the documents are stored, after the prior approval of the Board or any other authority as required under the applicable law pursuant to which the documents have been preserved.

6.3 Destruction of documents may take place in the following manner :

(1) **Destruction of paper records**

All documents destroyed pursuant to this Policy will be cut by a mechanical shredder or otherwise destroyed by physical means to ensure their complete destruction.

(2) **Destruction of magnetic media**

Documents stored on magnetic media such as floppy disks must be destroyed by reformatting at least once. Deleting files from magnetic media is not sufficient to ensure the destruction of the records. Back-up copies of the documents must also be destroyed.

(3) **Destruction of optical media**

Documents held on optical media such as rewritable disks must be destroyed by cutting, crushing or other physical means.

(4) **Destruction of server data**

Documents in electronic form contained on servers and hard drives will be deleted and overwritten.

(5) **Destruction of data on other media**

Electronic data contained on all other media will be destroyed by the physical destruction of that media.

7 SUSPENSION OF DISPOSAL OF DOCUMENTS 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 forthwith inform the Chief Records Administrator and any further disposal of documents shall be suspended until such time as the Chief Records Administrator determines otherwise. The Chief Records Administrator in such case shall inform all the employees by mail of the need to retain all the relevant documents and suspend disposal of the same.

8 ARCHIVAL OF DOCUMENTS

8.1 All documents created towards or through the activities of the Company are the property of the Company. Inactive documents which may be considered of permanent, historical or legal value will be transferred to the archives of the Company

8.2 The documents submitted to the stock exchanges, to be hosted on the website for the purpose of compliance with disclosure norms will also be archived :

- a. Archiving of the documents to be submitted to the stock exchanges, in terms of the Listing Regulations, will be done after the lapse of the preservation period of 5 years, as per the archival policy.
- b. Documents to be submitted to the stock exchanges in compliance with disclosure norms as required by any other applicable law are to be archived after the lapse of the specified prescribed time period.

9 POLICY REVIEW

This Policy and the Document Retention Schedule shall be reviewed by the Board as and when considered necessary.

DOCUMENT RETENTION SCHEDULE

	RECORD TYPE	RETENTION PERIOD	CONCERNED DEPARTMENT
A.	ORGANISATIONAL RECORDS		
	Corporate Records		
	Company Incorporation related documents	Permanent	Secretarial Department
	Register of Renewed and Duplicate Share Certificates	Permanent	Secretarial Department
	Register of Charges under Section 85 of the Companies Act, 2013	Permanent	Secretarial Department
	Register of members (including foreign register) under Section 88 of the Companies Act, 2013	Permanent	Secretarial Department
	Register of contracts or arrangements in which Directors are interested under Section 189 of the Companies Act, 2013	Permanent	Secretarial Department
	Minutes of meetings of the Board (including meetings of Committees of the Board) and general meetings	Permanent	Secretarial Department
	Register of Directors and Key Managerial Personnel and their shareholding under Section 170 of the Companies Act, 2013	Permanent	Secretarial Department
	Dividend Reconciliation Statement as long as unclaimed Dividend remains	Permanent	Secretarial Department
	All books and documents relating to issue of Share Certificates (including blank forms) shall be preserved for not less than thirty years, and in case of disputed cases, shall be preserved permanently	Permanent	Secretarial Department
	Instruments relating to creation, modification or satisfaction of charge	For a period of 8 years	Secretarial & Finance Department
	Copies of annual returns prepared under Section 92 and copies of certificates or documents required thereto	For a period of 8 years	Secretarial Department
	Office copies of Notice, Agenda, notes on Agenda and other related papers	For a period of 8 years	Secretarial Department
	Attendance registers of the meeting of the Board including meetings of Committees of the Board	For a period of 8 years	Secretarial Department
	Register of Proxy	For a period of 8 years	Secretarial Department
	Notice of Interest by Director	For a period of 8 years	Secretarial & Finance Department
	Filings with the Registrar of Companies and Stock Exchange Filings in physical and electronic form	For a period of 5 years from the date of filing	Secretarial Department
	Licenses and Permits, Industrial Entrepreneur Memorandum and other statutory approvals	Permanent	Respective Plant Head

	Property Records such as Original Purchase or Sale or Lease Agreements (and related transaction materials)	Permanent	Secretarial Department
	Trade mark Registrations, Patents ,Copyrights and Intangibles	Permanent	Secretarial Department
	Annual Reports	Permanent	Secretarial & Finance Department
	All other Company Records (not specifically addressed)		Respective Department
	CORRESPONDENCE AND INTERNAL MEMORANDA		
B.	Equipment Records		Respective Plant Head
	Dealership agreements		Marketing Department
	Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	For a period of 8 years	Purchase & Marketing Departments, as applicable
	Correspondence or Memoranda pertaining to Routine Matters and having no significant lasting consequences	To be discarded within 2 years	Respective Department
	Correspondence or Memoranda pertaining to Non-Routine Matters or having significant lasting consequences	For a period of 3 years	Respective Department
			Respective Department
	CORPORATE SOCIAL RESPONSIBILITY RECORDS		
C.	Records on projects relating to corporate social responsibility, amounts spent, projects undertaken and progress thereon	For a period of 3 years from the end of the financial year in which the amount is spent	Accounts & Finance Department
	ACCOUNTING AND FINANCE		
D.	Account Payable Ledgers and Schedules	For a period of 8 years	Accounts & Finance Department
	Account Receivable Ledgers and Schedules	For a period of 8 years	Accounts & Finance Department
	Annual Audit Reports and Financial Statements	Permanent	Accounts & Finance Department
	Annual Audit Records, including work papers and other documents relating to audit	For a period of 8 years	Accounts & Finance Department

	Annual budgets and approved revisions thereon		Accounts & Finance Department
	Bank Reconciliations	For a period of 8 years	Accounts & Finance Department
	Register of loans or guarantee or security and acquisition by the Company under Section 186 of the Act	Permanent	Accounts & Finance Department
	Register of investments including investments not held in its own name by the Company under Section 187 of the Companies Act, 2013	Permanent	Accounts & Finance Department
	Register of Debenture-holders or other security holders (including foreign register) under Section 88 of the Act	For a period of 8 years	Accounts & Finance Department
	Books of Accounts and financial statements including Auditors' report	For a period of 8 years	Accounts & Finance Department
	Invoices		Accounts & Finance Department
	Employee Expense Reports	For a period of 8 years	Accounts & Finance Department
	General Ledger	For a period of 8 years	Accounts & Finance Department
	Investment Records	For a period of 8 years	Accounts & Finance Department
	Security deposit receipt copies	For a period of 8 years	Accounts & Finance Department
	All other Accounting and Finance Records (including working sheets/computations, etc) of the Company	For a period of 8 years	Accounts & Finance Department
	TAX RECORDS		
E.	Tax-Exemption documents and Related Correspondence	Permanent	Accounts & Finance Department
	Excise Tax records	Permanent	Accounts & Finance Department
	Payroll Tax records	For a period of 8 years	Accounts & Finance Department
	Tax Bills, Receipts, Statements	For a period of 8 years	Accounts & Finance Department
	Tax Returns - Income, Franchise, Property	Permanent	Accounts & Finance Department
	Tax work paper packages - Originals	For a period of 8 years	Accounts & Finance Department
	Sales Tax Records	For a period of 8 years	Accounts & Finance Department

	Annual Information Returns - State and Central	Permanent	Accounts & Finance Department
	Documents pertaining to service tax, customs, indirect taxes such as Central Sales Tax and Value Added Tax	For a period of 5 years	Accounts & Finance Department
	PERSONNEL RECORDS		
F.	Policy and Procedures Manuals	Permanent	HR Department
	Employee Earnings Records		HR Department
	Employee Handbook and Training/Induction Material	Permanent	HR Department
	Files of Individual Employees	Permanent	HR Department
	Employee Personnel Records (including individual attendance records, time sheets, medical records, application forms, employment agreements and agency agreements, job or status change records, performance evaluations, accommodation due to disability, termination papers, withholding information, test results, training and qualification records)	For 3 years after the end of financial year after retirement/ cessation of services	HR Department
	Commission / Bonuses / Incentives / Awards	For a period of 8 years	HR / Accounts & Finance Department
	Workers Compensation Records	For a period of 8 years	HR Department
	Retirement and Pension Records	For 3 years after end of financial year after retirement/ cessation from service	HR / Accounts & Finance Department
	PAYROLL RECORDS		
G.	Employee Deduction Authorization	For 3 years after cessation of service of employment	HR Department
	Payroll Deductions	For 3 years after cessation of service of employment	HR Department
	Labour Distribution Cost Records including details regarding gratuity and disbursements at retirement	For 3 years after cessation of service of employment	HR Department
	Payroll Registers (Gross and Net)	For 3 years after cessation of service of employment	HR Department
	Unclaimed Wage Records	For 3 years after cessation of service of employment	HR Department

	INSURANCE RECORDS		
H.	Insurance Policies (including expired policies)	For a period of 8 years	Accounts & Finance Department
	Annual Loss Summaries	For a period of 8 years	Accounts & Finance Department
	Audits and Adjustments	For a period of 8 years	Accounts & Finance Department
	Property Insurance Policies	For a period of 8 years	Accounts & Finance Department
	Insurance Certificates to the Company	For a period of 8 years	Accounts & Finance Department
	Group Insurance Plans - Active Employees	For a period of 8 years	Accounts & Finance Department
	Group Insurance Plans - Retirees	For a period of 8 years	Accounts & Finance Department
	Insurance Claims Files (including correspondence, medical records, injury documentation, etc.)	For a period of 8 years	Accounts & Finance Department
	Journal Entry Support Data	For a period of 8 years	Accounts & Finance Department
	Releases and Settlements	For a period of 8 years	Accounts & Finance Department
	LEGAL FILES AND RECORDS		
I.	Legal Memoranda and Opinions	For 3 years after the closure of the matter	Legal Department
	Litigation files	For 1 year after the disposal of the case	Legal Department
	Court Orders	Permanent	Legal Department