

BARTRONICS INDIA LIMITED

Policy on

Preservation of Documents

&

Archival of documents on the website

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1. INTRODUCTION

- 1.1 The purpose of this document is to present policy statement for Bartronics India Limited ('Company') regarding preservation of its documents and archival of documents in the website in accordance with the provisions of the Companies Act, 2013 and Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR").
- 1.2 The policy is framed to ensure systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy gives guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

2. PURPOSE OF THE POLICY

- 2.1 The policy on preservation of documents and archival is mandated by the provisions of regulation 9 of Chapter III of LODR, 2015. As per the requirement of Regulation of 30(8) of LODR, the Company shall disclose on its website all such events or information which has been disclosed to Stock Exchange(s) under LODR, and such disclosures 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

3. DEFINITIONS

- 3.1 "Policy" means this Policy on preservation of documents and archival of documents in the website.

4. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED

- 4.1 The Company's physical and electronic documents shall be classified for the purpose of preservation as follows:
- A. Documents whose preservation shall be permanent in nature;
 - B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions.
 - C. Documents with preservation period other than those mentioned 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 a preservation period of other than those mentioned in A & B above shall be preserved accordingly.

Maintenance of documents in electronic mode shall be as may be permitted and prescribed under various legislations/guidelines.

The list of documents for the above categories is given in the **Annexure.**

5. RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS

All the employees of the Company shall be responsible for ensuring proper preservation of the documents in their respective work responsibilities and are expected to discharge judiciously the responsibility of taking decisions to retain/preserve or destroy documents pertaining to their work responsibilities as per this policy.

6. Destruction of documents mentioned in Sub Clause (B) and (C) of Clause 4.1 of this Policy

Any of the documents mentioned in sub clause (B) and (C) of clause 4.1 of this policy, which are not required to be maintained and preserved permanently may be destroyed.

The documents / records that have lived their life as per the policy may be disposed of at the right time as unnecessary retention of records consumes time, space and equipment use. The documents / records referred to in Annexure B and Annexure C which are required to be preserved for at least 8 years and 3 years respectively (or such additional period decided by the respective Department Heads of Company), may be disposed of after the expiry of the said period of their preservation, with the approval of the respective Department Heads of the Company.

There shall be maintained a register of disposal of records (which is to be maintained permanently) wherein the brief particulars of the documents/records disposed of shall be entered by the respective Department Heads of the Company either in physical or electronic form.

The register of disposal of records shall contain the following columns:

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORIZED PERSON

7. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS

- 7.1 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, any further disposal of documents connected with the matter shall be suspended until such time the investigation / litigation ends.

8. STATUTORY REQUIREMENTS

- 8.1 If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

9. WEB ARCHIVAL POLICY

- 9.1 The Company shall disclose on its website all events or information which has been disclosed to Stock Exchange(s) and retain the same for period of five years.
- 9.2 At the end of five years, the information shall be archived and preserved for a further period of three years.

10. POLICY REVIEW

- 10.1 The Managing Director/Board of Directors of the Company is authorised to periodically review the policy and make such changes as considered necessary.

11. AMENDMENT

Any amendment or modification in the Listing Regulations and any other applicable regulations relating to this Policy shall automatically be applicable to the Company.

ANNEXURE

A. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE:

1. Accounting and Finance records including Annual Financial statements and Audit Reports;
2. Investment records;
3. Tax records including annual returns;
4. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks;
5. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records;
6. Personal files of individual employees (Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc);
7. Any other record as may be decided by any KMP (as per Companies Act 2013) or the Managing Director or the Board of Directors of the Company from time to time;
8. Filings with Registrar of Companies.
9. A copy of Members Data including details of transactions in physical folios provided by RTA on quarterly basis.
10. A copy of Register of Debenture holder provided by RTA at the end of each quarter.

B. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:

1. Bank Statements and vouchers;
2. Instrument creating Charge or Modification thereof
3. Annual Return and copies of all certificates and documents required to be annexed thereto
4. Notice of Interest by Directors and Key Managerial Personnel
5. Attendance Register of Meetings of the Board and Committees
6. Attendance register of general meeting
7. Register of Proxies
8. Disclosures from Promoters and others under SEBI (Substantial Acquisitions of Shares and Takeover) Regulations, 2011
9. Filings with Stock Exchanges and other statutory authorities;
10. Corporate Social Responsibility Records;
11. Sponsorship Projects Records;
12. Correspondence and Internal Memoranda;
13. Any other record as may be decided by the Managing Director/Board of Directors of the Company from time to time;

14. Security Deposit Receipts (after receipt of deposit money back);
15. Tender Documents;
16. Lease Deeds and Contracts;
10. Legal files;
11. Insurance Records including policies and claims;
12. All e-mail correspondence, internal & external;
13. Any other record as may be decided by the Managing Director of the Company from time to time.
14. Dividend/Interest/Redemption Master data file containing details for each dividend/interest/redemption paid by the Company.
15. Dividend/interest/redemption reconciliation data of the Paid and Unpaid dividend/interest/redemption details
16. Reconciliation report on maintenance of stationery including blank certificates, dividend/interest/redemption warrants.
17. A List maintained by RTA of the folios for which enhanced due diligence is exercised.
18. A copy of report of the Internal Audit submitted by RTA.
19. A copy of Action Taken report, audit observations along with the corrective steps taken by the RTA.

C. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN THREE YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS:

1. Proof of sending Notice of Board Meetings and Committee meetings and its delivery.
2. Proof of sending Agenda and Notes on Agenda and their delivery.
3. Proof of sending and delivery of the draft of the Resolution(s) and the necessary papers.
4. Proof of sending draft Minutes of Board and Committee meetings and its delivery.
5. Proof of sending signed Minutes of Board and Committee meetings and its delivery.
6. Record of each recipient to whom the Notice of General Meeting(s) has been sent and copy of such record and any Notices of any failed transmissions and subsequent re-sending.