

North Karnataka Expressway Limited

POLICY FOR PRESERVATION AND ARCHIVAL OF DOCUMENTS

(I) Background:

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 [“Regulations”] requires every listed company to have a policy on Preservation of Documents / records maintained by the Company either in Physical Mode or Electronic Mode.

(II) Objective:

The purpose of this Policy is to provide a comprehensive methodology on the preservation and conservation of the Company’s records and documents. It provides guidance on the preservation and management of documents to help ensure the authenticity, reliability and accessibility of such documents. The policy aims at identifying, classifying, storing, securing, retrieving, tracking and destroying or permanently preserving records. It stipulates the duration and manner in and place at which records and documents of the Company shall be preserved

(III) Type of Documents:

- (1) The Company’s records and documents can be basically bifurcated into physical and electronic records. Documents can also be categorised into documents to be preserved for limited life span and those to be preserved permanently. This policy aims to delineate preservation and maintenance methodology for each such type of document
- (2) Physical records would consist of all the hand written or printed and signed books and records maintained by the Company in paper form. Physical records of the Company would include all the statutory registers, Minutes of the meetings, signed financials, books of accounts and other statutory records. Electronic records would comprise of all such documents which are digitally or virtually maintained in the electronic forms. Electronic record may or may not be authenticated by digital signatures. Examples of electronic records are email communications, statutory e-forms and e-returns uploaded online
- (3) Maintenance and preservation of certain records and documents is mandated by statutes such as the Companies Act, Income Tax Act, Labour laws, etc. There are also some other registers and records, the maintenance of which is not statutorily required but is essential for the smooth, efficient and systematic functioning of the company. Further life cycle of certain statutory documents is stipulated by law whereas certain documents are required to be preserved permanently

(IV) Place of Preservation of documents & Records :

- (1) All statutory records and documents along with all the supportive documents shall be maintained at the registered office of the Company. All the documents required to be maintained under the Companies Act, 2013, Secretarial Standards issued by the Institute of Company Secretaries of India, Listing Regulations, SEBI Regulations, FEMA shall be preserved under the custody of the Company Secretary of the Company. All Financials records required to be maintained under the Companies Act, 2013, Accounting Standards issued by the Institute of Chartered Accounts of India, Income tax Act, 1961, Service Tax Act and the Value Added Tax Act and related Acts shall be maintained under the custody of the Chief Financial Officer of the Company. All documents required to be maintained under the provisions of applicable labour laws shall be maintained under the custody of the Head of Human resource department of the Company
- (2) For paucity of space at the registered office of the Company, data which is not statutorily required to be maintained at the registered office of the Company may be kept at an external storage facility, provided that the data so preserved is capable of being easily accessed and retrieved when need be

(V) Method of Preservation:

- (1) All the statutory documents shall be preserved for such duration as has been prescribed in the relevant statutes. Documents shall be preserved in a chronological manner for each financial year. The person in charge of custody of the documents shall be responsible for proper maintenance and safe keeping of documents under his custody
- (2) Documents which are confidential in nature shall wherever possible be kept under lock and key and shall be shared on need to know basis only with persons directly involved in the transaction involving such documents and records

(VI) Inspection & Investigation:

- (1) Some of the registers and records are required to be kept open by a company for inspection by directors and members of the company and by other persons, including creditors of the Company. Upon receipt of advance notice from a member or from any other specified person, the Company shall facilitate inspection of such documents by such persons and allow extracts to be taken from certain documents, registers and records and to furnish copies of certain documents, registers and records. Such documents and records shall be kept open for inspection during the business hours of the company without payment of any fee
- (2) Government authorities have the right of access to all registers and records. The Government may order investigation into the affairs of the Company and may

order seal and seizure of documents and records. In such an eventuality the Company and its officers shall support and assist the government officers in every possible way

(VII) Tenor of maintenance of accounts:

- (1) All statutory documents and records shall be preserved for such period and at such place manner as has been prescribed under the relevant statute
- (2) Documents and Records required to be preserved pursuant to the provisions of Companies Act, 2013 and Rules made thereunder

(VIII) Documents hosted on the Company website:

Documents which are statutorily required to be hosted on the Company website shall be hosted within the prescribed timeline from the occurrence of the event. All Documents hosted on the website of the Company shall be preapproved by the Company Secretary of the Company. All statutory data shall be hosted on the Company website for a minimum period of five years. After which it shall be preserved in the Archival folder of the Company maintained offline until it is destroyed after the expiry of the statutory period

(IX) Register of documents destroyed to be maintained:

Documents and records may be destroyed after the expiry of the statutory period for the preservation the documents after keeping a suitable record of documents destroyed

(X) Review of this Policy

This Policy shall be subject to review by the Company at such intervals as may be deemed necessary

(XI) Policy Severable

In the event that any term, condition or provision of this Policy is being held to be in violation of any applicable law, statute or regulation, the same shall be severable from the rest of this Policy and shall be of no force and effect, and this Policy shall remain in full force and effect as if such term, condition or provision had not originally been contained in this Policy

The Policy shall be effective December 1, 2015