

**Policy for  
Preservation of  
Documents  
Of  
Gandhi Special Tubes  
Limited**

# **GANDHI SPECIAL TUBES LIMITED**

## **POLICY FOR PRESERVATION OF DOCUMENTS (IN PURSUANCE OF REGULATION 9 OF THE LISTING REGULATION)**

### **1. Preface**

The Board of Directors (the “Board”) of Gandhi Special Tubes Limited (the “Company”) has approved the following Policy (“The Policy”) of the Company for preservation of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode (hereinafter referred to as “the Documents”). This Policy has been formulated in accordance with the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). The Policy may be amended or modified by the Board of Directors by passing the resolution to that effect.

### **2. Purpose of the Policy**

The purpose of this Policy is to ensure that the all the documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same.

### **3. Definitions**

“Act” means the Companies Act, 2013.

“Applicable Law” means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

“Authorized Person” means any person duly authorized by the Board or the Managing Director or Joint Managing Director.

“Board” means the Board of directors of the Company or its Committee.

“Company” means GANDHI SPECIAL TUBES LIMITED.

Document(s) includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of this Act or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;

“Electronic Record(s)” means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.

“Electronic Form” means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.

“Maintenance” means keeping Documents, either physically or in Electronic Form.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

“Regulations” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015.

The words and phrases used in this Policy and not defined herein shall derive their meaning from the Applicable Law.

#### **4. Administration**

Attached as **Appendix A** is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode. The Compliance Officer of the Company, (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The documents not mentioned in the Appendix A shall be preserved for such time as may be stipulated under the respective laws and if nothing is applicable then in that case the Board will decide the period of preservation.

#### **5. Procedure for disposal of Documents**

The Documents of the Company which are no longer required as per the time schedule prescribed in the Appendix A may be destroyed. The Administrator may direct Employees in charge from time to time to destroy the Documents which are no longer required as per the Documents Preservation Schedule given under **Appendix A**. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the Documents in the format prescribed at Appendix B.

#### **6. Suspension of Documents disposal in the event of Litigation or Claims**

In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, than the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform all Employees of the Company for suspension of further disposal of Documents.

## **7. Amendment**

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

## **8. Archival Policy**

All information and reports uploaded / hosted on the website of the Company shall be archived after every expiry of every five years from date of its posting or hosting. The Archived documents shall be removed / deleted from the website after expiry of five years from date of its initial archive.

## APPENDIX A – DOCUMENTS PRESERVATION SCHEDULE

The Documents Preservation Schedule is organized as follows:

### Section Topic

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and papers
- E. Property Records
- F. Projects Records
- G. Correspondence and Internal Memo
- H. Insurance Records
- I. Personnel Records
- J. Electronic Records

A: Corporate Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Common Seal	Permanent
2	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
3	Statutory Registers	Permanent
4	License and Permissions	Permanent
5	Statutory Forms except for routine compliance	Permanent
6	Scrutinizers Reports	Permanent
7	Register of Members	Permanent
8	Index of Members	Permanent
Documents to be retained for a minimum period of 8 years		
9	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
10	Board Agenda and supporting documents	8 years
11	Attendance Register	8 Years
12	Office copies of Notice of General Meeting and related papers	8 Years
13	Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers	8 Years
Miscellaneous		
14	Register of Debenture-holders, if any	15 years after the redemption of debentures
15	Index of debenture-holders, if any	15 years after the redemption of debentures

B: Accounts and Finance		
Sr. No.	Record Type	Preservation period

Documents to be retained permanently

1	Annual Audit Reports and Financial Statements	Permanent
Documents to be retained for a minimum period of 8 years		
2	Annual Plans and Budgets	8 years after completion of Audit
5	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
6	Bank Statements	8 years
7	Investment Records	8 years
Miscellaneous		
8	General Correspondence	3 years
C: Tax Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Tax Exemption and Related documents	Permanent
2	Tax Bills, receipts and payments	Permanent
Documents to be retained for a minimum period of 8 years		
3	Excise Records	8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.
4	Tax Deducted at Source Records	8 years from the end of Financial Year or completion of assessment under the applicable law is over whichever is later.
5	Income Tax papers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
6	Service Tax papers	8 years from the end of Financial Year or completion of assessment under Service Tax whichever is later
D: Legal Files and Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Court Orders	Permanent
Documents to be retained for a minimum period of 8 years		
2	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts
Miscellaneous		
3	Legal Memoranda and Opinions including subject matter files	3 years after the close of matter
4	Litigation files	3 year after close of the Litigations
E: Property Records		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Original Purchase and Sale Agreement	Permanent
2	Property Card, Index II, Ownership records issued by Government Authority	Permanent
3	Property Insurance	Permanent

F: Project		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1	Project Documents and Related correspondence (including any proposal of the Project and its approval )	Permanent

G: Correspondence and Internal Memo		
Sr. No.	Records Type	Preservation period
Documents to be retained permanently		
1	Those pertaining to non-routine matters or having significant lasting consequences	Permanent
Miscellaneous		
2	1. Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. 2. Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings; 3. Letters of general enquiry and replies that complete cycle of correspondence; 4. Letter of compliant requesting specific actions that have no further value after change of name or address; 5. Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.	3 years

H: Insurance Records		
Sr. No.	Records Type	Retention period
Documents to be retained permanently		
1	Insurance Policies	Permanent
Documents to be retained for a minimum period of 8 years		
2	Journal Entry support data	8 years
3	Inspections Reports	8 years
Miscellaneous		
4	Claims records	Till settlement is over and claim money is received
5	Group Insurance Plans	Until plan is amended or terminated

I: Personnel Records		
Sr. No.	Records Type	Retention period
Documents to be retained permanently		
1	Payroll Registers	Permanent
2	Bonus, Gratuity and other Statutory Records	Permanent
Documents to be retained for a minimum period of 8 years		
3	Time office Records and Leave Cards	8 years
4	Unclaimed Wages Records	8 years
5	Employees Information Records	8 years after separation

Miscellaneous		
6	Employees Medical Record	3 years after separation

**J: Electronic Records**

1. Electronic Mail
  - All e-mails received from Internal and External Sources may be deleted after 8 years.
  - Employees will strive to keep their e-mails related to business issues.
  - All Emails related to business issues should be downloaded to a server or user directory on server.
  - Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources.
  - All e-mails of Employees which are important should be copied to the employees' folder.

2. Web Page Files : Internet cookies

All workstations Internet Explorer should be scheduled to delete Internet cookies once per month.

The Company does not automatically delete electronic files beyond the date specified in the Policy. It is the responsibility of all Employees to adhere to the guidelines specified in this Policy. Each month the Company will run backup copy of all Electronic files including email on servers. This backup is safeguard to retrieve lost information within 1 year retrieval period should the documents on network experience problems. The backup copy is considered a safeguard for the record retention system of the Company.

In certain cases document will be maintained both paper and electronic form.

**APPENDIX – B**

Sr. No.	Particulars of documents destroyed	Date and mode of destruction with the initials of Compliance Officer