

MINDTECK (INDIA) LIMITED

Document Retention and Archival Policy

Adopted by the Board of Directors

effective from December 01, 2015

DOCUMENT RETENTION AND ARCHIVAL POLICY					
Document Type		General		Validity	Until further amended
Version	Created By	Checked By	Approved By	Date of Release	
Version 1	Shivarama Adiga S.	Shivarama Adiga S.	Board of Directors	March 08, 2016	

Background

The Securities and Exchange Board of India (“SEBI”) has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, which became effective from December 01, 2015. The above regulations stipulate that all listed entities shall formulate a **Document Retention and Archival Policy**. In this context, the Document Retention and Archival Policy is being framed and implemented with effective from December 01, 2015.

Objective

This Policy deals with the retention and archival of all important corporate records of **Mindteck (India) Limited (hereafter, the “Company”)**

Corporate records include paper or electronic records of the Company but not limited to, certificates, contracts, Minutes, memoranda, contracts, e-mails, timesheets, effort estimates and expense records.

The Company is required to maintain certain types of corporate records for a specified period of time. Failure to do so could subject the Company, its Directors and Employees to serious legal consequences.

All employees are mandated to fully comply with this policy.

Generally, all corporate records (whether electronic or paper) of the Company other than statutory and important documents shall be retained for no less than three (3) years, and may be destroyed thereafter by a person duly authorised to do so.

If an employee believes, or the Company requires that, Company records are relevant for litigation or for potential litigation, then those records shall be preserved until the Company’s Legal Department advises otherwise.

This Policy shall be periodically reviewed and approved by the Board of Directors. The Board of Directors

may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time

Retention Period

The Board Considers that the following types of records that need to be retained for a longer period of time, as identified below:

Sl. No.	Type of Record	Records	Retention Period
1	Board of Directors' Records	All Minutes of meetings of the Board of Directors or Minutes of the Meetings of the Committee of Directors.	Perpetual
		Documents of Board or Committee meetings.	3 years
2	General Meetings' Records	Minutes of all General Meetings of the Company	Perpetual
3	Statutory Registers	All the Statutory Registers	Perpetual
4	Press Releases & Public Filings	All press releases and publicly filed documents.	Perpetual
		All events and press releases filed with the Stock Exchange(s) shall be published on the website of the company.	5 years
5	Books of Accounts and Tax Records	Books of accounts and Tax records.	8 years following the completion of the relevant transactions or assessment year for which the records were last used, provided there is no litigation.
6	Employment Records	Personnel records including background check, recruitment, employment and personal information. Records of performance reviews and any other matters arising in the course of employment, such as the actions taken against personnel.	10 Years from the date of cessation of employment provided there is no litigation.
		Labour Law Statutory documents.	Perpetual
		Labour Law compliance records.	8 Years
7	Intellectual Property Records	Documents relating to the development and protection of Intellectual Property Rights	Perpetual

8	Contracts	All contracts entered into by the Company	5 years following the expiry or termination of the contracts, provided there is no litigation.
9	Insurance Policy	All Insurance Policies of the Company	3 years from the date of expiry, provided that there is no claim.

Business Continuity Plan

The Company maintains a Business Continuity Plan (BCP) designed to ensure safety of Personnel, records and enable the Company to return to normal operation with minimal disruption.

In the event of major incident, the first priority is the safety of all Personnel followed by immediate action to rescue or prevent further damage to the records. Emergency response and recovery actions will be taken for other Company activities depending on the immediate threat.

The Company has made appropriate provision for the backup of its digital/electronic assets/records, including the provision of offsite secured copies. The Backup copies are maintained to ensure their continued access. The Company’s BCP ensures that the digital backup’s and technical infrastructure required to manage and access them can be restored at the alternative site in the event of an emergency. In the event of extended non-availability of present office premises, the Company will move to a temporary place on need basis.

Non-Compliance of this Policy may result in disciplinary action against the employee, including suspension or termination.

Any queries regarding this Policy shall be addressed to Compliance Officer for clarification.

Any amendment to this Policy shall be approved by the Board.