

Policy for Preservation of Documents

1. **Objective:** The objective of the '*Policy for Preservation of Documents*' is to classify the statutory documents of B&A Packaging India Ltd (hereinafter referred to as the Company) for preservation and to ensure that the records which are no longer necessary are discarded after following accepted norms as required under regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 (hereinafter referred to as the Regulations).
2. **Scope:** The '*Policy for Preservation of Documents*' is adopted by the Board of Directors of the Company to ensure safekeeping of the records and safeguard the statutory documents from getting manhandled while avoiding superfluous inventory of documents. It covers the various aspects on preservation of documents and also the safe disposal/destruction of the same.
3. **Definitions-** For the purpose of this Policy, 'Act' means the Companies Act' 2013.

'Applicable laws' shall mean any law, rules, circulars, guidelines, regulations, notifications issued by the Ministry of Corporate Affairs, Ministry of Finance, Ministry of Labour & Employment, Government of India, or any other Ministry which are applicable to the Company and under which the preservation of the documents has been prescribed.

'Authorised Person' means any person duly authorised by the Board of Directors or the Chief Executive Officer of the Company.

'Board' means the Board of Directors of the Company or its Committee.

'Current Document(s)' means any document, which still has relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract, or any like matter.

'Chief Executive Officer' means the Managing Director or Whole Time Director or Manager with whom substantial powers of the management have been vested by the Board.

'Document(s)' refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondences, minutes, indices, registers, and or any other record, required under or in order to comply with the requirements of any applicable law whether issued, sent, received or kept in pursuance of the Act' or under any other law for the time being in force or otherwise maintained on paper or electronic form and does not include multiple or identical copies.

'Electronic Record' 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 servers, computer, laptop, compact disc, pen drive, space on electronic cloud, or any other form of storage and retrieval device, consolidated feasible, whether the same is in possession or control of the company or otherwise the company has control and access over 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.

4. Administration of Policy: The Compliance Officer of the Company shall be in charge of administration of this policy and the implementation process and procedures to ensure that documents preservation schedule are followed.

5. Classification and Preservation of Documents: The preservation of documents shall be done in the following manner and as per and as per preservation schedule given in **Annexure A:**

- a) Where there is a period for which a document is required to be preserved as per applicable law for the period required by the said law.
- b) Where there is no such requirement prescribed by the applicable law, then for such period as the document pertains to be matter which is 'Current'.
- c) In case of any other documents, for such period, as a competent officer of the company who is required to deal with the document takes a considered view about its relevance. Provided that such documents may be preserved for a minimum period of one financial year from the day of its origination.

6. Modes of Preservation:

6.a. The documents may be preserved either in physical form or in electronic form.

6.b. The officer of the company required to preserve the documents shall be authorised person who is generally expected to observe the compliance of requirements of the applicable laws.

6.c. The preservation of documents should be such as to ensure that there is no tampering, alteration, destruction, or anything which endangers the content, authenticity, utility or accessibility of the documents.

6. d. The preserved documents must be accessible at all reasonable times. Access may be controlled by authorised person with preservation so as to ensure integrity of documents and prohibit unauthorised access.

6. e Such documents which the Chief Executive Officer deem necessary to be preserved in electronic mode may be preserved as such concurrently with its physical form and back up

of the such documents may be kept at such multiple places as the Chief Executive Officer may deem expedient.

7. Custody of the Documents: Subject to the applicable law, the custody of the documents shall be with the Authorised Person. Where the authorised person tenders resignation or is transferred from one location of company to another, such person shall hand over all the relevant documents, lock and key, access, control or password, or disc, or storage or media devices or such other documents and devices in his possession under the policy. The Chief Executive Officer in consultation with the Compliance Officer may authorise such other person as it may deem fit as the Authorised person.

8. Destruction of Documents:

8.1 Destruction of documents will be a normal administrative practice and it will apply to both documents maintained in physical and electronic mode.

8.2 The temporary documents excluding the current document(s) shall be destroyed after the relevant or prescribed period, by the Authorised Person, in whose custody the documents are stored, after the prior approval of the Chief Executive Officer or any other authority as required under the applicable laws pursuant to which the documents have been preserved. The categories of documents that may be destroyed as normal administrative practice are listed in **Annexure- B**.

8.3 A register of the documents disposed/destroyed shall be also be maintained in accordance with **Annexure- C**. It shall state the brief particulars of the documents destroyed, date of disposal/destruction and the mode of destruction.

8.4 The entries in the register shall be authenticated by the Authorised Person.

9. Conversion of the form in which documents are preserved:

9.1 The physical documents preserved may be converted whenever required or felt necessary into electronic form to ensure ease in maintenance of records and efficient utilization phase.

9.2 This will be done after obtaining prior approval of the Chief Executive Officer of the Company.

10. Authenticity: Where a document is being maintained both in physical and electronic mode the authenticity with reference to the physical form should be considered for every purpose.

11. Communication: Copy of this policy duly approved by the Board of Directors shall be forwarded to Human Resource Department (HRD) of the company and HRD is required to

notify and communicate the existence and contents of this policy to all functional heads/ employees of the company. Every new employee shall be informed about the policy by the HRD at the time of induction.

12. Interpretation: In any circumstances where the terms of this policy differ from any existing or newly enacted law, rules, regulations or standards governing the company, the said law, rules, regulations or standards will take precedence over these policies and procedures until such time as this policy is changed to conform to the law, rules, regulations or standards.

13. Approval and Review: The Board of Directors of B&A Packaging India Ltd has approved and adopted this "*Policy for Preservation of Documents* " and it shall be subject to review by the Board as may be deemed necessary and in accordance with any regulatory amendments.

Annexure - A**DOCUMENTS PRESERVATION SCHEDULE**

The Records of the Company may be classified as follows:-

- Corporate Records
- Accounts and Finance Records
- Banking Records
- Tax Records
- Legal Files and Records
- Property Records
- Projects Records
- Correspondence and Internal memo
- Insurance Records
- Factory Records
- Personal Records

Corporate Records		
Sr. No.	Record Type	Preservation Period
1	The Memorandum and Articles of Association of the Company Permanent	Permanent
2	Affidavit/Consent from the Subscribers to the Memorandum and from persons named as the First Directors	Permanent
3	All Statutory Registers	Permanent
4	Books and Documents relating to the issue of share certificates, including the blank forms of share certificates	Permanent
5	Minutes book of Board, Committee's and General Meeting	Permanent
6	Licenses & Permissions	Permanent
7	Common Seal	Permanent
8	Statutory Forms excluding routine forms	Permanent
9	Annual return	8 years from the filing with MCA
10	Attendance Registers-Board, Committee and General Meetings	Permanent
11	Office Copy of Notices of General Meetings, Scrutinizer's Report and Related Papers	8 financial years or as long as they remain current
12	Office Copy of Notice, Agenda, Notes on Agenda, Scrutinizer's Report and Related Papers of Board/Committee Meetings	8 financial years or as long as they remain current
13	All notices pertaining to disclosure of interest of directors	8 years
14	All Share of Scrip certificates surrendered to a company	3 years from date surrender
Accounts & Finance Records		

Sr. No.	Record Type	Preservation Period
1	Annual, Half yearly and Quarterly Audited/Unaudited Financial Statements	Permanent
2	Books of Accounts, Ledgers & Vouchers	8 years
3	Bank Statements	8 Years
4	Investment Records	8 Years
5	Annual Plans & Budgets	5 Years
6	General Correspondence	2 years
Banking Records		
Sr. No.	Record Type	Preservation Period
1.	Executed copy of Loan, Hypothecation, mortgage or any other agreement entered into by the company in connection with any accommodation received from any Bank or Financial Institution alongwith allied documentation, enclosures and confirmations.	Permanent
2.	Correspondence with Banks with regards to instructions for operating any current, cash credit or over draft account.	8 years.
3.	Counter foils of used cheque books; pay in slips, instructions for account transfers including wire or electronic transfers and letter of credit.	8 years from the end of the financial year to which the instruments or documents relate.
Tax Records		
Sr. No.	Record Type	Preservation Period
1	Excise Returns, Income Tax Returns, Sales Tax Returns, Service Tax Return or any Return filed under any other tax applicable to the Company	Permanent.
2	Tax Exemptions and Related documents	8 years.
3	Documents, Challans and other details/correspondence related to Excise, Income Tax, Sales Tax, Service Tax or any other tax applicable to the Company	8 years from the end of Financial Year or after completion of assessment under applicable law, whichever is later.
Legal Files and Records		
Sr. No.	Record Type	Preservation Period
1	Court Orders	Permanent
2	Contracts, Agreements and Related correspondence (including any proposal that resulted in contract and other supportive documentation)	Permanent
3	Legal Memoranda and Opinions including subject matter files	3 years after close of the matter
4	Litigation Files	Permanent
Property Records		
Sr. No.	Record Type	Preservation Period
1	Original Purchase and Sale Agreements/Deeds	Permanent
2	Property Card, Ownership Records issued by any	Permanent

	Government Authority	
Projects Records		
Sr. No.	Record Type	Preservation Period
1	Project sanctions and approval	Permanent
2	Other Documents and Related correspondence	8 years from the date of completion of the project
Correspondence and Internal Memo		
Sr. No.	Record Type	Preservation Period
1	Those pertaining to non-routine matters or having significant lasting consequences	8 Years
2	Correspondence and Memo pertaining to routine matters and having no significant impact lasting consequences	2 years
Insurance Records		
Sr. No.	Record Type	Preservation Period
1	Master Policies and related documents	Permanent
2	Policies for movable/immovable assets, vehicles etc.	2 years from the date of expiry. However, in case of any claims pending in respect of such policies, the same shall be preserved till the settlement of such claims.
3	Inspection/Survey Reports	2 years
4	Claim Records	12 months after settlement of the claims
Factory Records		
Sr. No.	Record Type	Preservation Period
1.	Licences and returns under Factories Act' 1948	Permanent
2.	Registers and records maintained in the factory.	Upto such period as prescribed under the Act or rules framed thereunder.
Personnel Records		
Sr. No.	Record Type	Preservation Period
1.	Payroll Registers	8 years.
2.	Bonus, Gratuity , Provident Fund and other Statutory personnel Records	Upto such period as prescribed under the Act or rules framed thereunder.
3.	Unclaimed Wages Records	8 years.
4.	Employee Information Records	2 years after separation.

Annexure -B

The following categories of Documents may be destroyed as normal administrative practice:

- ✓ Catalogues;
- ✓ Copies of press cuttings, press statements or publicity material;
- ✓ Letters of appreciation or sympathy, or anonymous letters;
- ✓ Requests for copies of maps, plans, charts, advertising material etc;
- ✓ Telephone message;
- ✓ Drafts of reports, correspondence, speeches, notes, spread sheets, etc; and
- ✓ Routine statistical and progress reports compiled and duplicated in other reports.

Annexure - C

The format of the register of Documents disposed/destroyed -

Sr. No.	Particulars of Documents Destroyed	Date and Mode of Destruction with the initials of Company Secretary or other authorised person
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