

PRADIP OVERSEAS LIMITED

Preservation of Documents Policy

Preface

The Policy for Preservation of Documents (“the 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 Board of Directors (the “Board”) of Windsor Machines Limited (the “Company”) has approved 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”).

Purpose of the Policy

The purpose of this Policy is to ensure that all the necessary 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. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

Effective Date

This Policy is effective from December 1, 2015.

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 Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

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.

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 the respective Employee(s) of the Company for suspension of further disposal of Documents.

Communication of this Policy

This Policy shall be handed over/circulate to the respective Department Heads of both units the Company within reasonable time of the adoption of this Policy by the Board of Directors of the Company.

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.

APPENDIX - A**DOCUMENTS PRESERVATION SCHEDULE:**

The Documents Preservation Schedule is organised as follows:

<u>A.</u>	<u>CORPORATE RECORDS</u>			
	<u>Sr. No.</u>	<u>Record Type</u>	<u>Preservation Period</u>	
	1	Certificate of Incorporation/ Registration and change of Name of the Company	Permanent	
	2	Common Seal		
	3	Minutes Books of Board, General Meetings and Committees Meetings		
	4	Statutory Registers under applicable law		
	5	Audited Financial Statements		
	6	Quarterly and Annual Financial Results		
	7	License and Permissions & Statutory Approvals	8 Years	
	8	Statutory Forms except for routine compliance		
	9	Scrutinizers Reports		
	10	Register of Members		
	11	Index of Members		
	12	Annual Returns		
	13	Attendance Register		
	14	Approvals/ Permissions issued by Stock Exchanges.		
	15	Quarterly/ Half yearly/Yearly Compliance Certificates/ Reports, Intimations of meetings, Disclosures, filed to the Stock Exchanges under relevant statutory law, rules, regulations etc.		
	16	Office copies of Notice of Board & General Meeting and related papers		5 Years
	17	Board Agenda and supporting documents.		
	Other Documents			
	18	Register of Debenture-holders, if any	15 Years	
	19	Index of debenture-holders, if any		
<u>B.</u>	<u>ACCOUNTS & FINANCE</u>			
	<u>Sr. No.</u>	<u>Record Type</u>	<u>Preservation Period</u>	
	1	Annual Audit Reports and Financial Statements	8 Years	
	2	Annual Plans and Budgets		
	3	Books of Accounts, Ledgers and Vouchers		

	4	Bank Statements	
	5	Investment Records	
Other Documents			
	6	General Correspondence	3 Years
<u>C.</u>	<u>TAX RECORDS</u>		
	<u>Sr. No.</u>	<u>Record Type</u>	<u>Preservation Period</u>
	1	Tax Exemption and Related documents	Permanent
	2	Tax Bills, receipts and payments	
	3	Excise & VAT/Sales Tax Records	8 Years
	4	Tax Deducted at Source Records	
	5	Income Tax papers	
	6	Service Tax papers	
<u>D.</u>	<u>LEGAL FILES AND RECORDS</u>		
	<u>Sr. No.</u>	<u>Record Type</u>	<u>Preservation Period</u>
	1	Court Orders	Permanent
	2	Legal Files	
	3	Licenses (All Renewed and Old)	
	4	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 Years
Other Documents			
	5	Legal Memoranda and Opinions including subject matter files	3 Years
	6	Litigation files	
<u>E.</u>	<u>PROPERTY RECORDS</u>		
	<u>Sr. No.</u>	<u>Record Type</u>	<u>Preservation Period</u>
	1	Original Purchase and Sale Agreement	Permanent
	2	Property Card, Index II, Ownership records issued by Government Authority	
	3	Property Insurance	
	4	Property Records	

<u>F.</u>	<u>PROJECT</u>		
	<u>Sr. No.</u>	<u>Record Type</u>	<u>Preservation Period</u>
	1	Project Documents and Related correspondence (including any proposal of the Project and its approval)	Permanent
<u>G.</u>	<u>CORRESPONDENCE AND INTERNAL MEMO</u>		
	<u>Sr. No.</u>	<u>Record Type</u>	<u>Preservation Period</u>
	Other Documents		
		Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. <ul style="list-style-type: none"> • Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings; • Letters of general enquiry and replies that complete cycle of correspondence; • Letter of compliant requesting specific actions that have no further value after change of name or address; • Other letters of inconsequential subject matter or that definitely close correspondence to 	3 years
<u>H.</u>	<u>Insurance Records</u>		
	<u>Sr. No.</u>	<u>Record Type</u>	<u>Retention Period</u>
	1	Insurance Policies	8 Years
	2	Journal Entry support data	
	3	Inspections Reports	
	Other Documents		
	4	Claims records	Till settlement is over and claim money is received
	5	Group Insurance Plans	Until plan is amended or Terminated

<u>I.</u>	<u>Personnel Records</u>		
	<u>Sr. No.</u>	<u>Record Type</u>	<u>Retention Period</u>
	1	Bonus, Gratuity and other Statutory Records (PF, ESIC etc.)	Permanent
	2	Personal File Record	
	3	Time office Records and Leave Cards	
	4	Unclaimed Wages Records	8 Years
	5	Employees Information Records	
	6	Appointment Letters	
	7	Payroll Registers	
	Other Documents		
	8	Employees Medical Record	3 Years
	9	Leave Card, OD	End of the Job
<u>J.</u>	<u>Electronic Records</u>		
	<u>Sr. No.</u>	<u>Record Type</u>	
	1	<p>Electronic Mail</p> <ul style="list-style-type: none"> • 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 on user system and copy of the same will be available 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 on the backup Device 	
	2	<p>Web Page Files : Internet cookies</p> <p>All workstations Internet Explorer should be scheduled to delete Internet cookies once per month.</p> <p>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. The backup copy is considered a safeguard for the Record retention system of the Company.</p> <p>In certain cases document will be maintained both paper and electronic form.</p>	

APPENDIX-B

DOCUMENTS DESTRUCTION SCHEDULE:

Sr. No.	Particulars of documents destroyed	Date of destruction of document	Mode of Destruction of document	Signature – Initial (Company Secretary or person authorized)