**Policy on Preservation of Documents and Archival.**

**1. Purpose and Scope**

In accordance with the provisions of the Companies Act, 2013 and in accordance with the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”), The Board of Directors of Infra Industries Limited have laid down the Policy for Preservation and Archrival of Documents. The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 mandates that the documents be classified in at least two categories as under:

1. Documents whose preservation shall be permanent in nature ;
2. Documents with preservation period of not less than eight years after completion of the relevant transactions.

Provided the Company may keep documents specified in clauses (a) and (b) in electronic mode

This policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business which can be revised/ modified by the Company with the approval of the Board.

1. **Classification of Documents to be preserved / retained:** 
   1. Documents that need to be preserved / retained permanently – Doc 1
   2. Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR – Doc 2
   3. Documents to be preserved electronically and archived when necessary – Doc 3
   4. Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case – Doc 4
   5. Emails and electronic documents – Doc 5

6. Documents like budget papers, bank guarantees etc., which may be retained for less than 8 years – Doc 6

1. **Administrator**

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

1. **Periodical Review of the Policy by Top Management**

This policy should be reviewed and amended periodically by the Top Management subject to approval of the Board. The Top management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time

**5. Administration**

The Record Retention Schedule approved by the Board of Directors for initial maintenance, retention and disposal schedule for physical records is as given in the annexure

**6. Suspension of Record Disposal in the event of Litigation or Claims**

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning Infra Industries Limited or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management determine otherwise.

1. **Type of Record** 
   1. Accounting and Finance records including Annual Financial statement
   2. Insurance Records
   3. Tax records
   4. Contracts entered into by the Company including Marketing Contracts
   5. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities
   6. Legal Files and Records
   7. Property Records
   8. Personnel and HR Records
   9. Corporate Social Responsibility Records
   10. Correspondence and Internal Memoranda
   11. Electronic Documents including email retention and back up
   12. Miscellaneous Records
2. **Accounting and Finance records including Annual Financial statement**

|  |  |  |  |
| --- | --- | --- | --- |
| **Record Type** | **Retention Period** | **Document** |  |
|  | **Type** |  |
|  |  |  |
| Accounts Payable ledgers and schedules | 8 Years | Doc 2 |  |
|  |  |
|  |  |  |  |
| Accounts Receivable ledgers and schedules | 8 Years | Doc – 2 |  |
|  |  |
|  |  |  |  |
| Annual Audit Reports and Financial Statements, Tax and Vat |  |  |  |
| Audit | Permanent | Doc – 1 |  |
|  |  |
|  |  |  |  |
| Annual Audit Records, including work papers and other | 8 years after |  |  |
| documents that related to the audit | Doc 2 |  |
|  | completion of audit |  |
|  |  |  |
|  |  |  |  |
| Bank Statement and Cancelled Cheques | 8 years | Doc – 2 |  |
|  |  |
|  |  |  |  |
| Employee Expense Reports | 8 years | Doc – 2 |  |
|  |  |  |  |
| General Ledger | Permanent | Doc – 1 |  |
|  |  |  |  |
| Investment Records | Permanent | Doc – 1 |  |
|  |  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
| Security deposit receipt copies | 3 years after |  |  |
|  |  |  |
|  | termination of the | Doc – 6 |  |
|  | contract |  |  |
|  |  |  |  |
| Fixed Asset Register with supporting Purchase Orders and Bills |  |  |  |
| for fixed assets addition | Permanent | Doc – 1 |  |
|  |  |
|  |  |  |  |
| Cost records | 8 years | Doc – 2 |  |
|  |  |  |  |
| Payroll extract, salary advice and payroll JVs | 8 years | Doc – 2 |  |
|  |  |
|  |  |  |  |
| Payroll TDS, PF, Gratuity, ESI return and challan applicable on | Permanent | Doc – 1 |  |
| payroll |  |
|  |  |  |
|  |  |  |  |
| Credit approvals from bank | Permanent | Doc – 1 |  |
|  |  |
|  |  |  |  |
| Bank Account passbook or statement, Bank Reconciliation |  |  |  |
| Statement and LC Documents | 8 years | Doc – 2 |  |
|  |  |
|  |  |  |  |
| Bank Guarantees | Till the expiry of | Doc – 6 |  |
|  | the claim period |  |
|  |  |  |
|  |  |  |  |
| Tax Litigation documents | Permanent | Doc – 1 |  |
|  |  |  |  |
| Bill of entries | Permanent | Doc – 1 |  |
|  |  |  |  |
| **2. Insurance Records** |  |  |  |
|  |  |  |  |
| Record Type | Retention Period | Document |  |
|  | Type |  |
|  |  |  |
| Annual Loss Summaries | 8 Years | Doc 2 |  |
|  |  |  |  |
| Audits and Adjustments | 8 Years | Doc – 2 |  |
|  |  |  |  |
| Claim Files (Including correspondence, medical records, injury |  |  |  |
| documentation, etc. | Permanent | Doc – 1 |  |
|  |  |
|  |  |  |  |
| Insurance Policies for the Company | Permanent | Doc – 1 |  |
|  |  |  |  |
| Journal Entry Support Data | 8 years | Doc – 2 |  |
|  |  |  |  |
| Releases and Settlements | Permanent | Doc – 1 |  |
|  |  |  |  |
| **3. Tax records** |  |  |  |
|  |  |  |  |
| Record Type | Retention Period | Document |  |
|  | Type |  |
|  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
| Tax Exemption Documents and related correspondence | Permanent | Doc 1 |  |
|  |  |  |  |
| Excise Tax records | Permanent | Doc – 1 |  |
|  |  |  |  |
| Payroll Tax records | 8 years | Doc – 2 |  |
|  |  |  |  |
| Tax Bills, Receipts, Statements | 8 years | Doc – 2 |  |
|  |  |  |  |
| Tax Returns – Income, Franchise, Property | Permanent | Doc – 1 |  |
| Tax workpaper packages Originals | 8 years | Doc – 2 |  |
|  |  |  |  |
| Sales Tax Records | 8 years | Doc – 2 |  |
|  |  |  |  |
| Annual Information Returns – State and Central | Permanent | Doc – 1 |  |
|  |  |  |  |
| Service Tax Records | 8 years | Doc – 1 |  |
|  |  |  |  |
| **4. Contracts entered into by the Company including Marketing Records** | |  |  |
|  |  |  |  |
| Record Type | Retention Period | Document |  |
|  | Type |  |
|  |  |  |
| Contracts and Related Correspondence | 8 years | Doc – 2 |  |
|  |  |
|  |  |  |  |

**5. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities**

|  |  |  |
| --- | --- | --- |
| Record Type | Retention Period | Document |
|  |  | Type |
| Corporate Records (certificate of incorporation, commencement of | Permanent | Doc – 1 |
| business, listing agreement, common seal, minutes book of board |  |  |
| and committees thereof, annual reports originals, etc.) |  |  |
|  |  |  |
| Licence and Permits, Industrial entrepreneurial Memorandum, | Permanent | Doc – 1 |
| and other statutory approvals |  |  |
|  |  |  |
| ROC Filings and Stock Exchange filings in physical and Electronic | 5 years from the | Doc 6 |
| form | date of filing |  |

**6. Legal Files and Records**

|  |  |  |  |
| --- | --- | --- | --- |
| Record Type | Retention Period | Document |  |
|  | Type |  |
|  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
| Legal Memoranda and Opinions | 3 years after the |  |  |
|  |  |  |
|  | closure of the | Doc – 4 |  |
|  | matter |  |  |
|  |  |  |  |
| Litigation files | 1 year after |  |  |
|  |  |  |
|  | expiration of | Doc – 4 |  |
|  | disposal of the case |  |  |
|  |  |  |  |
| Court Orders | Permanent | Doc – 1 |  |
|  |  |  |  |
| Correspondence, Property Deeds, Assessments, Licenses, Rights |  |  |  |
| of Way | Permanent | Doc – 1 |  |
|  |  |
|  |  |  |  |
| Original Purchase / Sale Deeds | Permanent | Doc – 1 |  |
|  |  |  |  |
| Original Lease Agreements | 8 years after |  |  |
|  |  |  |
|  | expiration of the |  |  |
|  | lease | Doc – 2 |  |
|  |  |  |
| Intellectual Property | Permanent |  |  |
| Servicemarks/trademarks and Copyrights | Doc – 1 |  |
|  |  |  |
| **7. Property Records** |  |  |  |
|  |  |  |  |
| Record Type | Retention Period | Document |  |
| Type |  |
|  |  |  |
|  |  |  |  |
| Purchase and Sale Agreements | Permanent | Doc – 1 |  |
|  |  |  |  |
| Records and Correspondences with the Authorities | Permanent | Doc – 1 |  |
|  |  |
|  |  |  |  |
| **8. Personnel and HR Records** |  |  |  |
|  |  |  |  |
| Record Type | Retention Period | Document |  |
| Type |  |
|  |  |  |
|  |  |  |  |
| Personnel Files of individual employees | Permanent | Doc – 1 |  |
|  |  |
|  |  |  |  |
| Commission / Bonuses / Incentives / Awards | 8 years | Doc – 2 |  |
|  |  |
|  |  |  |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Employee Earnings Records | 3 | years | after |  |  |
|  |  |  |
|  | termination | | of | Doc – 6 |  |
|  | service | | of |  |  |
|  | employment | |  |  |  |
|  |  |  |  |  |  |
| Employee Handbook & Induction Manual | Permanent | |  | Doc – 1 |  |
|  |  |  |
|  |  |  |  |  |  |
| Employee Medical Records | 3 | years | after |  |  |
|  |  |  |
|  | termination | | of | Doc – 6 |  |
|  | service | | of |  |  |
|  | employment | |  |  |  |
|  |  |  |  |  |  |
| Attendance records, application forms, job or promotion records, |  |  |  |  |  |
| performance evaluations, termination papers, test results, training | 3 | years | after |  |  |
| and qualification records, enquiry related papers | termination | | of |  |  |
|  | Doc – 6 |  |
|  | service | | of |  |  |
|  | employment | |  |  |  |
|  |  |  |  |  |  |
| Employment Contracts Individual | 3 | years | after |  |  |
|  |  |  |
|  | termination | | of | Doc – 6 |  |
|  | service | | of |  |  |
|  | employment | |  |  |  |
|  |  |  |  |  |  |
| Correspondence with Employment Agencies and Advertisements |  |  |  |  |  |
| for job openings | 3 years | |  | Doc – 6 |  |
|  |  |  |
|  |  | |  |  |  |
| Job Description | 3 years after | |  | Doc – 6 |  |
|  | superseding the | | |  |
|  |  |  |
|  |  |  |  |  |  |
| **11. Corporate Social Responsibility Records** |  |  |  |  |  |
|  |  |  |  |  |  |
| Record Type | Retention Period | | | Document |  |
| Type |  |
|  |  |  |  |  |
|  |  | |  |  |  |
| Records on CSR Projects(including amount budgeted, spent and | Permanent | |  | Doc – 1 |  |
| balance if any) projects undertaken and progress thereon |  |  |  |  |  |
|  |  |  |  |  |  |

**12. Correspondence and Internal Memoranda**

General Principle : Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract is active

1. Those pertaining to routine matters and having no significant, lasting consequences, should be discarded within two years
2. Those pertaining to non routine matters or having significant lasting consequences, should generally be retained permanently

**12. Electronic Documents including email retention and back up**

1. **Electronic Mail : Not all email needs to be retained, depending on the subject matters**

* All e-mail – from internal and external sources to be deleted after 24 months
* Staff will strive to keep all but an insignificant minority of their email related to business issues
* Staff will not store or transfer the Company related emails on non-work related computers except as necessary or appropriate with due approvals from the Central IT team and the respective Managers
* Staff will take care not to send confidential / proprietary information to outside sources

**Document Type : Doc 5**

2. Electronic Documents including PDF files

* PDF documents – Can be a maximum period of 8 years. But the said document may be destroyed depending upon the completion of the job or its use coming to an end
* Text/ Formatted files : All word / excel / Power point files may be deleted once every year depending on the importance.

**Document Type : Doc – 3**

**3. Web page files**

* May be retained for a period of 5 years as specified in SEBI’s LODR Regulations, 2015
* May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial period of five years of live page

**12. Miscellaneous Records**

|  |  |  |  |
| --- | --- | --- | --- |
| **Record Type** | **Retention Period** | **Document** |  |
| **Type** |  |
|  |  |  |
| Consultant Reports | 3 years | Doc – 6 |  |
|  |  |  |  |