

# **L.G.BALAKRISHNAN & BROS LIMITED**

## **POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL**

### **Preamble**

In terms of Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) 2015, the L.G.Balakrishnan & Bros Limited “the Company” is required to formulate a policy for preservation of documents required to be maintained under the Listing Regulations in at least two categories as specified in the said Regulation.

In terms of Regulation 30(8) of the Listing Regulations, the Company is required to formulate an archival policy for all disclosures of events / information to the Stock Exchange in terms of the Company’s Policy for Disclosure of Events / Information and Determining of Materiality.

### **Objective**

The purpose of this policy is to establish the framework needed for effective preservation of documents and records of the Company required to be maintained under the SEBI (Listing Obligations Regulations) 2015 (“LODR”), in terms of Regulation 9 and also to archive any of the material events or information which are disclosed by the Company to the Stock Exchanges in terms of Regulation 30.

### **The policy for preservation of documents**

1. Documents and Records of the Company required to be maintained under the Listing Regulations shall be classified in two categories as below:
  - Documents whose preservation shall be permanent in nature shall be preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time;
  - Other Documents shall be preserved for a period of not less than eight (8) years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.
2. The listing documents and records in physical form shall be in the custody of the Company Secretary of L.G.Balakrishnan & Bros Limited.

3. The Company may keep the listing documents and records as specified above in electronic mode.
4. The Registrar and Share Transfer Agent shall ensure that the correct procedures are followed for maintenance of the Listing Records required to be maintained by them and provide an annual undertaking to the Company in this regard.
5. If an employee believes, or the Company requires that the Company records are relevant to litigation or potential litigation, then these records need to be preserved until the Legal Department advises otherwise.

### **Modes of preservation**

The Documents above mentioned may be preserved in

1. Physical form or
2. Electronic Form.

### **Authenticity**

Where a document is being maintained both in physical form and Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

### **Roles & responsibilities**

The respective Functional / Departmental heads of the Company shall be responsible for maintenance and preservation of documents in respect of the areas of operations falling under the charge of each of them, in terms of this Policy.

### **Records that need to be retained**

#### **Secretarial Records:**

1. Minutes of meetings of the Board of Directors shall be maintained in perpetuity.
2. A copy of all materials provided to the Board of Directors or Committees of the Board shall be maintained for no less than three (3) years.

#### **Finance, Accounts and Tax Records:**

1. Books of finance and accounts should be retained for at least eight (8) years following the completion of the relevant transactions

2. Tax records should be retained for at least eight (8) years following the completion assessment year for which the records were last used

### **Intellectual Property Records:**

Documents relating to the development and protection of intellectual property rights should be maintained for the life of such intellectual property rights.

### **Destruction of documents**

The documents which are not required to be maintained and preserved permanently may be destroyed after the expiry of the specified retention period in such mode and under the instructions approved by the Functional/ Departmental Heads.

### **Archival policy**

As per Regulation 30(8) of the Listing Regulations, the Company is required to disclose on its website all such events or information which is to be disclosed to the Stock Exchanges pursuant to this Regulation. All such disclosures shall be archived as per the Company's Policy.

### **Archival requirement**

Any disclosure of events or information which have been submitted by L.G.Balakrishnan & Bros Limited to the Stock Exchange under Regulation 30 of the Listing Regulations will be available on the website of the Company for a period of 5 years from the date of its disclosure and shall thereafter be archived from the website of the Company for a period of 3 years.

As a policy on safety of resources, in the event of major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records.

Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

### **Website updation / updates**

The Company shall upload the approved policy on its website [www.lgb.co.in](http://www.lgb.co.in)

### **Amendment**

The right to amend/modify/interpret this Policy vests in the Board of Directors of the Company.