



WELTERMAN INTERNATIONAL LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

1. SCOPE

A policy on preservation of Documents (defined below) would ensure safekeeping of the records and safeguard the Documents from getting manhandled, while at the same time avoiding superfluous inventory of Documents. The Company, therefore, formulates this policy, in pursuance to Regulation 9 of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Regulations"), on preservation of the Documents to aid the employees in handling the Documents efficiently. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

2. DEFINITIONS

"Act" means the Companies Act, 2013.

"Applicable Law" means any law, rules, circulars, guidelines or standards issued by Securities Exchange Board of India, Ministry of Corporate Affairs and The Institute of Company Secretaries of India under which the preservation of the Documents has been prescribed.

"Authorised Person" means any person duly authorised by the Board.

"Board" means the Board of directors of the Company or its Committee.

"Company" means WELTERMAN INTERNATIONAL LIMITED.

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

"Document(s)" refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, 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 in Electronic Form and does not include multiple or identical copies.

"Electronic Record(s)" 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 computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of

storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to 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.

“Regulations” mean the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

3. CLASSIFICATION

The preservation of documents of the Company, as approved by the Board of Directors of the Company, which shall classify them in at least two categories as follows:

- Documents whose preservation shall be permanent in nature;
- Documents with preservation period of not less than eight (8) years after completion of the relevant transactions.

(An indicative list of the Documents and the timeframe of their preservation is provided in Annexure I)

4. MODES OF PRESERVATION

4.1 The Documents may be preserved in:

- Physical form; or
- Electronic Form

4.2 The officer of the Company required to preserve the Document shall be Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law.

4.3 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.

4.4 The preserved Documents must be accessible at all reasonable times. Access may be controlled by Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

5. 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 the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or Company Disc, other storage devices or such other Documents and devices in his

possession under the Policy. The Board may authorise such other person as it may deem fit as the Authorised Person.

6. DESTRUCTION OF DOCUMENTS

6.1 Destruction as a normal administrative practice usually occurs because the records are duplicated, unimportant or for short term use only. This applies to both Physical and Electronic Documents.

6.2 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 Board or any other authority as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents may be destroyed as normal administrative practices are listed in Annexure II.

6.3 A register of the Documents disposed/destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of disposal/destruction and the mode of destruction.

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

(The format of the register has to be in accordance with Annexure III)

7. AUTHENTICITY

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

8. AMENDMENT

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.

ANNEXURE I

INDICATIVE LIST

PERMANENT PRESERVATION	TEMPORARY PRESERVATION
<u>Companies Act, 2013</u>	
<ul style="list-style-type: none">• The memorandum and articles of the company• Affidavit from the subscribers to the memorandum and from persons named as the first directors• Register of members• Books and Documents relating to the issue of share certificates, including the blank forms of share certificates• Annual return• The foreign register of members• Register of charges• Minutes book of general meeting	<ul style="list-style-type: none">• Register of charges (8 years)• Register of debenture holders or any other security holders (8 years from the date of redemption of debentures or securities)• Copies of all annual returns prepared under Section 92 of the Companies Act, 2013 and copies of all certificates and Documents required to be annexed thereto (8 years from date of filing with the Registrar)• Foreign register of debenture holders or any other security holders (8 years from the date of Redemption)• All notices pertaining to disclosure of interest of directors• All certificates surrendered to a company (3 years from date of surrender)• Register of deposits (not less than 8 years from the date of last entry)• Instrument creating a charge or modification (8 years from date of satisfaction of charge)
<u>Secretarial Standard</u>	
<ul style="list-style-type: none">• Minutes of Board meeting (SS1)	Office copies of Notices, Scrutiniser's Report, and related papers (as long as they remain current or for 8 financial years), whichever is later (SS2).
	Office copies of Notices, Scrutiniser's Report, and related papers (as long as they remain current or for 10 years or as long as they remain current.

ANNEXURE II

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 (subject to Clause 6 of this Policy)
- Facsimiles where a photocopy has been made
- Telephone message
- Drafts of reports, correspondence, speeches, notes, spread sheets, etc. (subject to Clause 6 of this Policy) and
- Routine statistical and progress reports compiled and duplicated in other reports (subject to Clause 6 of this Policy)

ANNEXURE III

The format of the register of Documents disposed/destroyed –

PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF APPLICABLE LAW	DATE AND MODE OF DESTRUCTION	INITIALS OF THE AUTHORISED PERSON