

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF RECORDS

1. PURPOSE AND SCOPE:

Purpose of this document is to present a policy statement for Chemmanur Credits and Investments Limited (CCIL) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (LODR) and any other applicable regulatory provisions.

The policy is intended to define CCIL's preservation of documents, responsibilities of departments in respect of such preservation and to provide guidance to the executives and staff working in CCIL in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frames the guidelines for fundamental accountability of CCIL to retain and preserve its documents as the basis for communication with a range of external stakeholders. The 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.

Appendix to the policy provides the types of records to be preserved, departments who are responsible for the same, on how long certain documents should be retained, and when those documents should be disposed of, if no longer needed and the appendix to this policy is inclusive but not exhaustive.

2. STATUTORY MANDATE:

The policy on preservation of documents and archival is mandated by the provisions of Regulation 9 of Chapter III of LODR, 2015. Under this regulation, the Company has a strategic objective of ensuring that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources.

3. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED / RETAINED:

Following documents shall be retained and preserved for posterity.

Classification	Preservation / retention / archival status
Doc-1	<i>Documents that need to be preserved / retained permanently</i>
Doc-2	<i>Documents that may be preserved / retained for a period of 10 years</i>
Doc-3	<i>Documents to be preserved electronically and archived when necessary</i>
Doc-4	<i>Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case</i>
Doc-5	<i>Emails of all employees in the grade of Senior Manager and above for a period of 3 years</i>
Doc-6	<i>Documents like budget papers etc., which may be retained for a period of 3 years to 10 years</i>

CHEMMANUR CREDITS AND INVESTMENTS LIMITED

4. DISCLOSURES AND ARCHIVAL POLICY ON WEBSITE:

Company shall ensure that all events or information required to be disclosed as per applicable SEBI (LODR) Regulation, 2015 shall be hosted on the company's website for a period of 5 years and thereafter archived for three years.

5. RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS:

All employees in the Company are responsible for taking into account the potential impact on preservation of the documents as prescribed in their work area and the decision to retain/preserve or destroy documents pertaining to their area of work as prescribed in the Appendix. Such policy bestowing responsibility on the Company's employees would immensely help company's response to any notice or query or inspection or audit from any regulator or statutory authority or as a litigation preparedness tool helping the Company's and Outside legal counsel to track down documents to handle the notices, query, clarification, audit, inspection from any quarter or to fight and represent in legal cases.

6. PERIODICAL REVIEW OF THE POLICY:

The Policy should be complied with by all levels of employees. The policy should be reviewed periodically by the Board. The Board shall also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time.

7. ADMINISTRATION:

The Record Retention Schedule is as given in the Appendix.

8. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS:

If the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning CCIL or commencement of any litigation against the Company, such employee shall inform the Top Management of suspension of further disposal or destruction of documents until such time as the Top Management with the due advice from the legal counsel determine otherwise. The Top Management in such an eventuality shall inform all the connected employees by mail of the need to retain the documents and suspension of disposal or destruction of the same.

APPENDIX

1. Accounting and Finance records including Annual Financial statement

Record Type	Retention Period	Document Type
Accounts Payable ledgers and schedules	10 Years	Doc-2
Accounts Receivable ledgers and schedules	10 Years	Doc-2
Annual Audit Reports and Financial Statements	Permanent	Doc-1
Annual Audit Records, including work papers and	10 Years after	Doc-2

CHEMMANUR CREDITS AND INVESTMENTS LIMITED

other documents that related to the audit	completion of audit	
Annual Plans and Budgets	3 years after the budget year is closed	Doc-6
Bank Statement and Cancelled Cheques	10 years	Doc-2
Employee Expense Reports	10 years	Doc-2
General Ledger	Permanent	Doc-1
Interim Financial Statements	10 years	Doc-2
Notes Receivable ledgers and schedules	10 years	Doc-2
Investment Records	Permanent	Doc-1
Security deposit receipt copies: - (a) for settled amounts (b) for Others	10 years after termination of the contract. Permanent	Doc-2
Responsibility	FINANCE AND ACCOUNTS DEPARTMENT	

2. Insurance Records

Record Type	Retention Period	Document Type
Annual Loss Summaries	10 Years	Doc-2
Audits and Adjustments	10 Years	Doc-2
Insurance Policies for the Company	Permanent	Doc-1
Journal Entry Support Data	10 Years	Doc-2
Responsibility	ADMINISTRATION DEPARTMENT	

3. Tax records

Record Type	Retention Period	Document Type
Tax-Exemption Documents and related correspondence: - (a) of our Company (b) of others submitted to the Company	(a) Permanent (b) 10 Years	Doc-1 Doc-2
Payroll Tax records	10 Years	Doc-2
Tax Bills, Receipts, Statements	10 Years	Doc-2
Tax Returns - Income, Property	Permanent	Doc-1
Service Tax / GST Records	10 Years	Doc-2
All Orders from the Tax Department: - (a) If not disputed further (b) If disputed	(a) 10 Years from the date of order (b) Further 10 years from the date of the final judgement / decision	Doc-2
Responsibility	FINANCE AND ACCOUNTS DEPARTMENT	

CHEMMANUR CREDITS AND INVESTMENTS LIMITED

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 business, name change certificate, Certificate of registration from RBI and other business related registrations, permissions, licenses, listing agreement, common seal, MOA, AOA, annual reports originals, etc.	Permanent	Doc-1
Attendance Registers of Board, Nomination, Stakeholders Relationship, Audit, Risk Management and CSR committees, and other statutory approvals	Permanent	Doc-1
ROC Filings and Stock Exchange filings in physical and electronic form	8 years from the date of filing	Doc-6
Board Files	5 years	Doc-6
Minutes of the Meeting of the Board, its committees, shareholders, creditors	Permanent	Doc-1
Statutory Registers and records	Permanent	Doc-1
Responsibility	SECRETARIAL & COMPLIANCE DEPARTMENT	

6. RBI related records including Board Approved Policies

Record Type	Retention Period	Document Type
RBI correspondence file	5 years	Doc-6
RBI complaint file (all complaints received through RBI)	5 years	Doc-6
FIU Correspondence File	5 years	Doc-6
RBI compliance audit	5 years	Doc-6
Board Approved Policies	Permanent	Doc-1
Structural Database maintained electronically containing details of Insiders, information shared by insiders and information shared with insiders	10 years	Doc-2
Records on CSR Projects (including amount budgeted, spent and balance if any) projects undertaken and progress thereon if any	10 years	Doc-1
Disclosure of trading by insiders and immediate relatives	5 years	Doc-6
Responsibility	SECRETARIAL & COMPLIANCE DEPARTMENT	
