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STAHL

POLICY FOR PRESERVATION OF DOCUMENTS

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I Preamble

The Securities and Exchange Board of India (SEBI) (Listing Obligations and Disclosure Requirements) Regulations, 2015 mandate listed entities to formulate a Policy for preservation and archiving of documents. It is in this context that the Policy for Preservation of Documents (“Policy”) is being framed and implemented.

II Objective

The objective of this Policy is to classify the documents in two categories i.e.

- i) documents which need to be preserved permanently; and
- ii) documents which need to be preserved for a specific period of time.

III Definitions

- i) The words/terms used in this Policy shall have the meaning ascribed to such terms in the Companies Act, 2013, rules made thereunder and the Listing Regulations (collectively, the ‘Statutory Provisions’), as the case may be.
- ii) For the purpose of this Policy, “Document” means document maintained in any medium, (paper, electronic, optical, magnetic, etc.), that is created, received, transmitted or used in the course of and in relation to the business of the Company.
- iii) Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

IV Scope

This Policy applies to all departments and business functions of the Company but does not apply to personal or non-business information.

V Periodicity of preservation of documents

The periodicity of preservation of documents shall be as specified in Annexure 1 to this policy.

VI Accessibility and retrieval of records

- i) Physical records shall be kept confidentially, securely with access control and with ease of retrieval, whether in-house or externally. Measures should be taken for physical security of the records maintained like selection of area of record room, firefighting device, access control, etc.
- ii) Wherever allowed/required by any law/statute, records may be maintained in electronic form. In case records and documents are maintained in electronic form, all the requirements relating to Information Technology Act, 2000, including any statutory amendment(s) or modification(s) thereto, shall be adhered to.

VII Destruction of documents

- i) All information generated in the course of the Company’s business activities that is not required to be retained must be safely destroyed as soon as practicable, but in any event within 180 days of the completion of the project/ assignment/ contract.

- ii) The Documents should be destroyed at the end of the preservation period specified under Clause V of this Policy. The destruction should be carried out in a way that preserves the confidentiality of any information they contain, if so required. A record should be kept about the Documents that have been destroyed.
Records which are required to be maintained for certain period of time, shall be added to the archive when it no longer has a business need.
Documents must be destroyed in a safe and confidential manner and should not be sold as scrap.
- iii) Electronic information, including e-mails that are no longer required to be retained, must be purged using appropriate techniques which ensure that the data cannot be reconstructed from the storage media on which it resided. Records stored on magnetic media must be destroyed by reformatting at least once. The backup copies of the records must also be destroyed.

VIII Hold on record destruction and deletion

- i) If a lawsuit or other proceeding involving the Company is reasonably foreseeable, all destruction of any possibly relevant documents, including e-mail, shall cease immediately. Documents relating to the lawsuit or potential legal issue will then be retained and organized under the supervision of the Legal Department.
- ii) In the event of a Document Hold Direction, the concerned Department shall immediately suspend all disposition of records maintained on-site or off-site location as appropriate; and the Legal Department shall immediately notify all appropriate employees by suitable mode of communication that they are not to dispose of relevant records until notified otherwise.

IX Responsibility

Respective Functional heads shall be responsible for monitoring the implementation of this Policy. Subject to clause VIII of the policy, respective Functional Heads shall be final authority regarding preservation/destruction of records.

X Effective Date

This Policy shall be effective from 5th January 2023.

XI Policy Review

The Board of Directors on its own or on the recommendation of the Audit committee may review the Policy from time to time. All changes/amendments to the Policy will be approved by the Board of Directors. Should there be any inconsistency between the terms of the Policy and the statutory requirements, the statutory provisions shall prevail.

XII Communication/Enforcement

- i) As per the provisions of the Listing Regulations, the Policy shall be disclosed on the website of the Company.
- ii) For all new Employees, a copy of this policy shall be handed over as a part of the joining documentation, along with other HR related policies. For all existing Employees

and Directors, a copy of this policy shall be posted on the intranet and the web-site of the Company.

- iii) Failure to comply with this Policy on Preservation of Documents may result in disciplinary action.

XIII Contact Details

Queries regarding enforcement of the Policy should be referred to the Functional Heads of the Company

Annexure 1

Period of Preservation of Documents

Records as per the Companies Act, 2013 and SEBI Regulations

The Company shall maintain all records as per the Companies Act, 2013 as per the requirements under the Companies Act, 2013.

The Company shall maintain all records as per SEBI Regulations for not less than 8 (Eight) Years. Documents that are to be made available on the Company's website in Compliance with the SEBI (Listing Regulations and Disclosure Obligations), 2015 will be made available on the website for a period of 5 years and thereafter will be archived for a period of 3 years.

Tax Records

Tax records includes, but are not limited to Documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal preferred against any claim made by the relevant tax Authorities. Tax Records shall be maintained for a period of 8 (Eight) Years after a final Order has been received with respect to any matter which was preferred for Appeal, as the case may be.

Employment /Personnel Record

The Company is required to keep certain documents relating to recruitment, employment and personnel information, performance review, action taken by or against any employee, complaints by or against any employee. These Documents relating to Employment or Personnel information shall be retained for a period of at least 8 (Eight) years after the employee leaves the organization.

Press Releases

Press Release shall include, but shall not be limited to, any intimation given to the press regarding financial results, profits, Meetings of the Board, General Meetings, and overall performance of the Company. The Company shall retain all Press Releases for at least 8 years.

Legal Documents

Legal Documents shall include, but shall not be limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter, Awards, Documents relating to property matters.

A contract shall be retained for a period of 8 (Eight) Years or for 8 (Eight) Years after the expiry of the term of the contract, whichever is higher.

Documents relating to any property owned by the Company shall be retained perpetually. Other property Documents shall be retained for a period of 8 (Eight) Years or for a period of 8 (Eight) Years after the rights in such property ceases to exist, whichever is higher.

Orders passed by any Court or Tribunal or any Authority or Judgment which are final in nature and cannot be superseded shall be retained permanently. Interim Orders shall be retained till a Final Order is received or for a period of 8 (Eight) Years whichever is higher.

Pleadings shall be retained for a period of 8 (Eight) Years or till the matter has been disposed off, whichever is higher.

Marketing and Sales Documents

The Company shall retain relevant marketing and sales Documents for a period of at least 8(Eight) Years.

Intellectual Property Documents and Licenses

Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents that are owned by the Company shall be retained by the Company permanently.

Licenses shall be retained till the time the validity of the License and for a period of 8 (Eight) Years thereafter or for a period of at least 8 (Eight) Years, whichever is higher.

E-mails

E-mails relating to audit work papers and financial controls should be retained for at least 8 years.

All emails to the Company's Officers or Audit Committee relating to complaints on auditing, accounting, frauds or internal controls should be retained permanently.

Any messages exchanged between the Company and third parties (such as consultants and auditors) should be archived, regardless of their content. Instant messages have the same status as e-mails and should be treated identically.