

# Policy on Preservation and Archival of Documents

## Version 1.0

### Adopted by the Board of Directors of

#### **Rane Holdings Limited**

CIN L35999TN1936PLC002202

#### **Rane (Madras) Limited**

CIN L65993TN2004PLC052856

#### **Rane Engine Valve Limited**

CIN L74999TN1972PLC006127

#### **Rane Brake Lining Limited**

CIN L63011TN2004PLC054948

*(Collectively known as "Rane Group of Companies" and Individually referred to as "the Company")*

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## Preservation of Documents and Archival of documents

### 1. Scope and Objective

- 1.1 Preservation of Company's documents in accordance with the provisions of the various legal and regulatory requirements.
- 1.2 This policy on preservation of documents and archival of documents aims at providing a guidance on determining the period of documents to be preserved and their systematic archival to enable access and retrieval, as and when required.

### 2. Guideline

For an effective preservation and archival of documents, this policy guides all the employees within the Company to adopt the following approach in the absence of any specific internal guidelines or Quality System Procedure (QSP) for records:

	<b>Form</b>	<b>Type</b>	<b>Archival (post preservation period)</b>
Permanent	Physical and / or Electronic	A	Not applicable
8 years (CA 2013 and SEBI LODR)	Physical and / or Electronic	B	One year beyond 8 years
Till completion of assessment / litigation / event / transaction	Physical	C	5 years after completion of relevant assessment / resolution of litigation / event / transaction (Refer Note 2.1.a.)
3 years	Electronic	D	One year beyond 3 years
Less than 8 years	Physical and / or Electronic	E	One year after preservation period (ESI records 5 years)

#### Note:

- 2.1.a. Litigation documents include, but not limited to, contracts, legal opinions, pleadings, orders passed by any court or tribunal, judgements, interim orders, documents relating to cases pending in any court or tribunal or any other authority empowered to give final decision.
- 2.1.b. Property Documents : Documents relating to property owned by the Company shall be retained perpetually in original (physical) form. Additionally, the Company shall endeavour to keep these property documents in digitised form for permanent preservation. Property documents pertaining to properties in which rights cease to exist, shall be retained for a period of 5 (five) years after the rights cease to exist. If desired, the digitised form of these documents may be preserved beyond this period.
- 2.1.c. Order passed by the court or tribunal or any other authority or judgement which are final in nature and cannot be superseded shall be retained permanently. Interim orders shall be retained for a period of five years after the final order is received.
- 2.1.d. Pleadings shall be retained for a period of five years or till the time matter has been disposed off, whichever is later.

### 3. Responsibility

Respective functional heads of the Company are responsible for safeguarding the records taking into account the impact, imminent or potential, on preservation or non-preservation, of the documents in their work area and their decision to retain / preserve / destroy documents pertaining to their area.

#### **4. Review**

The functional heads will review this policy document, including for the purpose of compliance with any changes in the legislations / regulation, from time to time. The business heads will also review compliance to this policy periodically.

#### **5. Approval**

This policy and any subsequent amendments, thereto, shall require approval of the board of directors.

#### **6. Disposal of physical records**

6.1. Respective functional head shall annually review the documents that can be disposed off after the expiry of preservation period as per the guideline and prepare a log of such documents for necessary approval by the business heads. The business heads shall ensure that suitable digital backups are created in respect of legal, statutory and regulatory documents and records identified for disposal and shall initiate disposal only after securing the approval of the board of directors.

6.2. The respective functional heads shall maintain a log of such documents and records disposed off, in perpetual.

#### **7. Disposal of records suspension period**

During the period of any legal or regulatory proceedings, including any inspection, investigation, conciliation or litigations, records and documents connected or relevant to the proceedings, shall be suspended from disposal until such time the proceedings are finally concluded or advise from the legal department, as the case may be.

#### **8. Disaster recovery**

8.1 The employees shall ensure safeguard of documents and record and return to normalcy of operations with minimal disruption. Detailed procedures for responding to an incident are part of the business continuity plans / Disaster Recovery Management followed at respective locations.

8.2 The respective department shall make adequate provisions for the backup of its digital collections of records that are required to be maintained permanently, including the provision for any offsite security copies. The backup copies are actively maintained to ensure their continued viability. The Company's business continuity plans ensures that the digital collections and technical infrastructure required to manage and access them can be restored in the event of an emergency.

#### **9. Effective date**

This policy has been approved by the board of directors vide resolution dated November 26, 2015 and shall come into effect on December 1, 2015.

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