

THACKER AND COMPANY LIMITED

POLICY FOR PRESERVATION OF DOCUMENTS:

Purpose:

The Securities & Exchange Board of India (SEBI) has mandated the Companies to frame and adopt a Policy for Preservation of Documents of the Company vide SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 (Listing Regulations) As per Regulation 9 of Listing Regulations the Company has adopted this policy.

The documents of the Company are either in physical or electronic form. Preservation of documents has been a requirement under various statutes as evidence in legal process, audit process and management requirements. Hence, the purpose of this policy is to provide a frame work for preservation of documents maintained by the Company under various applicable laws, back up the important data and eliminate the possibility of accident or innocent destruction.

Classification of Documents:

Document includes papers, notes, agreements, summons, notice, advertisements, requisitions, orders, declarations, forms, vouchers, minutes, registers and or any other records required under or in order to comply with the requirements of laws, whether issued, sent, received or kept in pursuance of the law for the time being in force or otherwise, maintained on paper or in electronic form or in any other form but does not include multiple or identical copies.

The documents are broadly classified on to following categories:

- Documents whose preservation shall be permanent in nature under various laws as applicable to the Company,
- Documents with preservation period of not less than eight (8) years after the completion of the relevant transaction under any law as applicable to the Company.
- Apart from above, there may be routine records that do not require long term retention and are required to be preserved only for current periods

as also records which are required to be preserved for a period lesser than 8 years. This policy does not endeavour to cover these documents.

Document Preservation Schedule:

- 1 Documents as per the Companies Act, 2013 (the Act) and Listing Regulations:

The Company shall maintain all statutory documents as per the applicable provisions of the Act read with the Rules thereunder. Further, the Company shall maintain all the records as per the Listing Regulations for not less than 8 (eight) years.

Documents relating to Minutes of the meetings of the Board of Directors, Committees of the Board and shareholders, financial statements, audit reports and all the statutory registers/records, filings with MCA, stock exchanges and other regulatory authorities as prescribed under the applicable laws and rules shall be preserved for such period as is provided in the applicable law and regulations. Any document where preservation period is not mentioned shall be preserved for a period not less than 8 (eight) years.

- 2 Documents as per other statutes:

Documents required to be maintained under FEMA, 1999, Reserve Bank of India Act, 1934 or any other applicable laws and regulations shall be maintained and preserved as per the provisions of such laws, regulations and guidelines from time to time.

- 3 Taxation Documents:

Taxation (Direct or Indirect tax) documents include, but not limited to documents concerning tax payments, tax returns, tax audits and certifications, transaction records including records for international transactions, related party transactions, proof of deductions, tax assessments, tax litigations including appeals and petitions preferred against tax authorities. Tax documents shall be maintained for a period as prescribed under applicable laws or for a period not less than 8 (eight) years or for a period as may be required under applicable law after a final order has been received with respect to any matter as the case may be.

- 4 Employment / Personnel record:

The documents relating to recruitment/employment and personal information, attendance, performance review, training and

development, union wage settlement, separation schemes, action taken by or against employees shall be retained for a period not less than 8 (eight) years after the usual period for which they need to be maintained.

5 Legal Documents:

Legal documents shall include, but shall not be limited to contracts, agreements, legal opinions, impending claims, legal actions, pleadings, orders passed by any court or tribunal, judgements, interim orders, documents relating to a case pending in any court/tribunal or any authority and documents relating to property matters.

A contract shall be preserved for period not less than 8 (eight) years after the expiry of contact.

Documents relating to property owned by the Company shall be preserved perpetually. Other documents shall be preserved for a period not less than 8 years or for a period of 8 years after the rights and obligations in relation to such property cease to exist whichever is longer.

Orders passed by Court/tribunal or any other authority which are final in nature and cannot be superseded shall be preserved permanently. Interim orders shall be preserved till a final order is received. Pleadings shall be preserved for a period of 8 years or till the subject matter is disposed of whichever is longer.

6 Marketing and Sales documents:

The Company shall preserve all marketing and sales related documents for period not less than 8 years.

7 Intellectual property rights (IPR) Documents and Licences:

IPR Documents shall include but not limited to copyrights, trademarks, patents and industrial designs. IPR documents that are owned by the Company shall be preserved permanently.

Licences shall be preserved till the time of validity of the licence and for a period of 8 years thereafter. Licences that are required to be preserved for a longer period shall be decided on case to case basis.

8 Treasury related documents:
Documents related to fund raising, investments, foreign exchange hedging and all treasury related activities shall be retained as provided in the concerned legislation / regulation or otherwise for a period of 8 years.

9 OTHER DOCUMENTS:
All other documents and records not covered above shall be preserved as provided in the applicable legislation. If there is no legislative provision, the same shall be preserved for a period of 8 years.

Documents Maintenance and Storage:

All documents shall be maintained either in physical form or in electronic form or both by the respective departments of the Company to which such documents relate. All electronic versions of the documents are to be maintained within the Company's centralized electronic record software database which is maintained in line with policy of the IT services department of the Company.

Disposal of Records:

Each Department will have to conduct a review of retained records every year after the end of the first quarter and destroy the records that are not required to be preserved beyond the statutory retention period under proper supervision. All documents having no long term value and which are not part of accounting records, such as memos, progress reports and other informatory papers need not be preserved. All back up and archived copies of a record should be destroyed when the original is destroyed.

The destruction and disposal of documents shall be done in compliance with the provisions prescribed under the applicable laws and keeping in view this policy of the Company. All documents containing information of a confidential or sensitive nature on paper, card, or electronic media must be securely destroyed when it is no longer required.

If a law suit or other proceeding involving the Company is reasonably foreseeable, the destruction of relevant documents should cease immediately. Violation of this aspect of the Company document retention policy could subject the Company and the employees involved to civil and criminal penalties.

Electronic Documents including e Mails:

All electronic communication systems as well as all communications and stored information transmitted, received or contained on the Company's information systems are the property of the Company. Such communication and information shall be preserved in accordance with the policy of the Company in respect thereof, which shall be in consonance with this Policy.

Policy Enforcement:

While minimum retention periods are suggested in regard to certain documents, the retention of the documents not included above shall be determined by the Head of the Department in line with the policy that governs those documents or by application general guidelines affecting such documents.

General:

Where the terms of this policy differ from any existing or newly enacted law, rules and regulations governing the Company the Law, Rules, Regulations will take precedence over this policy and procedures until such time the policy is changed to conform to the Law, Rules and Regulations.

Effective Date:

The Policy as approved by the Board of Directors shall be effective from 1st December, 2015.

Changes:

The Company may amend the policy as when deemed necessary either pursuant to change in law or otherwise. The Company may devise and implement any supplementary or other policies and guidelines in respect this policy for better implementation.