



(Formerly known as NTL India Private Limited)



NTL INDIA LIMITED

POLICY ON PRESERVATION OF RECORDS

*Under Regulation 9 of the Securities and Exchange Board of India
(Listing Obligations and Disclosure Requirements) Regulations, 2015*

+91 9840226002 admin@ntlchennai.org ntlchennai.net CIN No. U63040TN2005PLC055690

Regd. Office : No. 11/2, Muthaiyal Street Alandur, Chennai-600 016, Tamilnadu, India. Tel : 044-66666677.

POLICY ON PRESERVATION OF RECORDS

1. Preamble:

Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as the “**SEBI Listing Regulations**”), requires every listed company to formulate a policy on preservation of documents approved by the board of directors. During the course of business, the Company generates several records either in physical or in electronic modes. While most of the records are useful for a shorter span of time, and hence such records are kept for a definite period of time, some records may be needed to be preserved for a longer period of time or permanently during the lifetime of the organization. In order to preserve such records, the Company needs to implement a well-considered, well-documented plan to ensure that they remain trustworthy and useful over a period of time.

2. Scope and Applicability:

In terms of the provisions of Regulation 9 of the SEBI Listing Regulations, the Company shall have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows:

- i. documents whose preservation shall be permanent in nature;
- ii. documents with preservation period of not less than eight years after completion of the relevant transactions

Further, pursuant to the provisions of the SEBI Listing Regulations, a listed company shall disclose on its website all such events or information which have been disclosed to the stock exchange(s), and such disclosures shall be hosted and retained on the website of the Company for a minimum period of 5 (five) years from the date of its publication and thereafter, as per this policy.

Accordingly, the Board of Directors has formulated and approved this policy to preserve the documents of the Company.

This Policy shall cover all business records of the Company, including written, printed and recorded matter and electronic forms of records. The Policy ensures that the Company maintains, protects and preserves both physical and electronic records/ documents for such minimum period as required by the law for the time being in force. All records must be kept, keeping in mind the confidentiality and nature of the documents. The Policy also deals with the retrieval process and disposal / destruction of obsolete records.

This Policy will guide the Company, employees and officers in handling the documents efficiently and maintenance of any documents, their preservation and disposal/destruction.

3. Definitions:

- a. “**Act**” means the Companies Act, 2013 & rules made thereunder;

- b. **"Applicable law(s)"** means any laws, rules, regulations, circulars, guidelines or standards applicable to the Company under which any guidelines / provisions with regard to the preservation of the Documents have been prescribed;
- c. **"Authorised person"** means the functional head of the concerned department or any person duly authorised by the Board;
- d. **"Company"** or **"NTL"** means NTL India Limited;
- e. **"Document(s)"** or **"Record(s)"** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record (including required under or in order to comply with the requirements of any applicable laws) maintained on paper or in Electronic Form and does not include multiple or identical copies;
- f. **"Electronic form"** means maintenance of documents in any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other digital 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;
- g. **"Maintenance"** means keeping documents either physically or in electronic form;
- h. **"Policy"** means this Policy on Preservation of Records;
- i. **"Preservation"** means to keep in good order and to prevent documents from being altered, damaged or destroyed;
- j. **"SEBI Listing Regulations"** means Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015.

4. Preservation of Documents / Records:

The documents shall be preserved in the following manner:

- a. All statutory records required to be maintained under any applicable law/ or under any directions or instructions from any statutory or regulatory authority shall be preserved for the period prescribed therein.
- b. All documents relating to any show cause notice, demand notice, order, decree, direction from any court, tribunal, or any judicial or administrative authorities shall be preserved for a minimum period of eight years from the date of disposal of the matter.
- c. Documents in respect of which no minimum maintenance timeline is stipulated under any of the law shall be preserved **for a period of three years from the date of event**.
- d. Copies of all material licenses for conducting business of the company shall be preserved permanently.
- e. Beyond the mandatory hosting period of 5 (five) years, the information disclosed on the website of the Company shall be archived for retrieval for a period of 2 (two) years, considering the requirements of the applicable laws.

Commented [T1L71]: Added at my end – nothing was mentioned here

5. Custody of Documents

- a. All documents shall be under the proper custody of concerned Functional Head(s) or such other officer or employee as assigned by him as the Authorised Person.
- b. It shall be the responsibility of the concerned Functional Head(s) or Authorised Person to keep the annexed Documents Preservation schedule updated from time to time to ensure that it is in compliance with the various Acts/ Rules/ Regulations applicable to their respective departments and for this purpose, they shall communicate any changes desired in the abovementioned schedule to the Company Secretary.
- c. The concerned Functional Head shall keep in his/her custody the documents which are important and/or confidential in nature and a list of the same shall be maintained in a register to be kept in his/her custody and he/she shall be responsible for the preservation of the same. The said documents along with the register shall be handed over by him/her to the successor in the event of such Functional Head leaving the Company/department.
- d. All documents can be maintained by the Company in physical or electronic or digital mode, if permitted under the applicable Acts/Rules/Regulations.
- e. All digital records/ scanned copies of physical records may be stored or preserved in such servers in the control of system administrator or any cloud-based servers as may deem fit by the Authorised Person, which can be retrieved at any time during the preservation period.
- f. An employee who seeks to be relieved from the Company shall transfer all digital records in his/her control to system administrator before relieving him/her from the service of the Company subject to the satisfaction of concerned Functional Heads.

6. Disposal and Destruction of Records

- a. All physical records not required to be preserved permanently under any law for the time being in force may be either destroyed or converted to electronic format, after the minimum preservation period of eight years subject to the discretion of the Functional Head(s) or the Authorised Person. All electronic records shall be preserved permanently.
- b. The Company shall maintain a Register of Documents Destroyed in the format given in the **Annexure** wherein it shall enter brief particulars of the documents destroyed, and all entries made therein shall be authenticated by the by concerned functional heads or Authorised Person, after obtaining prior approval of the Chairman or Managing Director or Whole-time Director of the Company.
- c. The Register of Documents Destroyed shall be produced whenever required by the concerned authority/auditors.
- d. Where the Company has been served with any notice requisitioning documents from any of the regulatory and statutory authorities or any litigation is commenced by or against the Company, in such cases the destruction of the related documents shall be suspended till such time the matter is settled or resolved or disposed-off finally.
- e. The IT department shall make appropriate provision for back up for electronic documents. In the event that it is necessary to manually dispose of an electronic document, the IT Department shall use the "Permanent Delete" function to permanently dispose of electronic documents.

Commented [T1L72]: Included at my end

7. Disclosure

The above Policy and subsequent amendments thereto shall be disclosed on the Company's website.

8. Implementation and Review of the Policy

The Board shall be responsible for implementation and review of this Policy in whole or part. Any amendment or waiver of any provision of this Policy should be approved by the Board of Directors of the Company. In the event of any conflict between the provisions of this Policy and applicable laws, the provisions of applicable laws shall prevail and the part(s) so repugnant shall be deemed to be severed from the Policy and the rest of the Policy shall remain in force. Any subsequent amendment/ modification in the Applicable Laws shall automatically apply to this Policy.

9. Effective Date

Provisions of the regulations under this policy shall be applicable to the Company from the date when the securities of the company are listed on Stock Exchanges.

Annexure

REGISTER OF DOCUMENTS DESTROYED

SN	Section / Rule under Companies Act, 2013	Description of Document destroyed	Period up to which document was preserved	Date of destruction	Mode of destruction	Initial of Company Secretary or other authorised person

