

## **POLICY FOR PRESERVATION OF DOCUMENTS**

### **PREAMBLE**

This policy has been framed pursuant to Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), effective December 1, 2015.

Policy for Preservation of Documents is classified into two categories:

- a) Documents whose preservation shall be permanent; and
- b) Documents to be preserved for not less than eight years.

### **DEFINITIONS**

- a) “Company” shall mean VITP Private Limited.
- b) “Documents” shall mean all papers, records, files, books etc., and the like as required to be maintained under any law or regulation for the time being in force.
- c) “Maintenance” means keeping Documents either physically or electronic form.
- d) “Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

### **PURPOSE**

The purpose of this policy is to ensure that all the necessary documents and records of the Company are adequately protected and preserved as per the relevant statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are destroyed after following the due process for destruction of the same.

### **PRESERVATION OF DOCUMENTS**

**The Documents Preservation Schedule is organized as follows:**

<b>A.</b>		
<b>Sl no.</b>	<b>Record Type</b>	<b>Period</b>
<b>A. CORPORATE RECORDS</b>		
<b>Documents to be preserved permanently</b>		
1.	Minutes Books of Board , General Meetings and Committees meetings	Permanent
2.	Statutory registers	Permanent
3.	Statutory forms except for routine compliances	Permanent
4.	Register of members	Permanent
5.	Index of members	Permanent
6.	License and Permissions	Permanent
<b>Documents to be retained for a minimum period of 8 years</b>		

7.	Annual Returns	8 years from the date of filing with Ministry of Corporate Affairs
8.	Board Agenda and supporting documents	8 years
9.	Attendance Register	8 years
10.	Notices of General Meetings and related papers	8 years
11.	Notice of Board Meeting/ Committee Meeting, Agenda, Notes on Agenda and other related papers	8 years
12.	Register of Debenture-holders, if any	8 years from the date of redemption
13.	Index of Debenture-holders, if any	8 years from the date of redemption
<b>B. ACCOUNTS &amp; FINANCE</b>		
<b>Documents to be preserved permanently</b>		
1.	Annual Audit Reports & Financial Statements	Permanent
<b>Documents to be retained for a minimum period of 8 years</b>		
2.	Annual plans and Budgets	8 years from the completion of Audit
3.	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial year or completion of assessment under Income Tax whichever is later
4.	Bank Statements	8 years
5.	Investment Records	8 years
<b>C. TAX RECORDS</b>		
<b>Documents to be preserved permanently</b>		
1.	Tax Exemption and Related documents	Permanent
2.	Tax Bills, receipts and payments	Permanent
<b>Documents to be retained for a minimum period of 8 years</b>		
3.	Excise Records	8 years from the end of Financial year or completion of assessment under the applicable law is over whichever is later
4.	Records related to TDS	8 years from the end of Financial year or completion of assessment under the applicable law is over whichever is later
5.	Income Tax Papers	8 years from the end of Financial year or completion of assessment under Income Tax whichever is later
6.	Service Tax Papers	8 years from the end of Financial year or completion of assessment under Service Tax whichever is later
<b>D. LEGAL FILES &amp; RECORDS</b>		
<b>Documents to be preserved permanently</b>		

1.	Court Orders	Permanent
<b>Documents to be retained for a minimum period of 8 years</b>		
2.	Contracts, Agreements, (including any proposal that resulted in the contract and other supportive documents)	8 years after termination or expiration of contracts
<b>Miscellaneous</b>		
3.	Lease deeds and related correspondence	1 year after the expiry of the lease
4.	Legal memoranda and opinions	3 years after the closure of the matter
5.	Litigation files	3 years after the closure of litigations
<b>E. PROPERTY RECORDS</b>		
<b>Documents to be preserved permanently</b>		
1.	Original copy of Purchase and sale Agreement	Permanent
2.	Property Card, Index II, Ownership records issued by Government Authority	Permanent
3.	Property Insurance	Permanent
<b>F. PROJECT RECORDS</b>		
<b>Documents to be preserved permanently</b>		
1.	Project Documents and related Correspondence (including any proposal of the projects and its approval.)	Permanent
<b>G. INSURANCE RECORDS</b>		
<b>Documents to be preserved permanently</b>		
1.	Journal entry	Permanent
2.	Inspections Reports	Permanent
<b>Documents to be retained for a minimum period of 8 years</b>		
3.	Claims records	Till settlement is over and money claimed is received
4.	Insurance Plans/ Group Insurance Plans	Until Plan is amended or terminated
<b>H. EMPLOYMENT/ PERSONNEL RECORDS</b>		
<b>Documents to be preserved permanently</b>		
1.	Payroll Registers	Permanent
2.	Bonus, Gratuity and other Statutory records	Permanent
<b>Documents to be retained for a minimum period of 8 years</b>		
3.	Unclaimed wages Records	8 years
4.	Employees Information Records	8 years or till the cessation of the employee.
5.	Final memoranda and correspondence reflecting performance reviews	8 years
<b>Miscellaneous</b>		
6.	Employees Medical Records	3 years

**Emails:**

a) Every email communication (received / sent) by all registered users (which includes but is not limited to employees, consultants, contractors, partners, external agency of company mail domain) will be retained permanently.

b) All mails will be stored in a mixed process of online and off-line storage. On a particular date, all mails older than a year will be transferred to offline storage devices. Thus, at any point of time, one year or older (but less than two years) mails of all users will be available on-line. Mails older than two years will be available in off-line storage media.

## **REVIEW**

This Policy has been adopted by the board of directors of the Company and the board may review and amend the Policy, as and when required to do so due to regulatory changes or under any other circumstances necessitating revision to the Policy.