



KIRLOSKAR ELECTRIC COMPANY LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

Policy on Preservation of Documents

1. Purpose and Scope:

Pursuant to Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”), Kirloskar Electric Company Limited (“the Company”) is required to formulate and put in place a policy for preservation of documents.

Accordingly, the Company has adopted this “Policy on Preservation of Documents” (“Policy”). The purpose of this Policy is to specify the type of document(s) and time period for preservation thereof.

2. Objectives:

To determine preservation period for records / documents based on their reference value and legal requirements. The following aspects are considered while arriving at the preservation period:

- Company's own information retrieval needs (reference value)
- Statutory requirements under respective statutes
- Litigation requirements
- To ensure easy retrieval
- To ensure that unwanted records do not occupy storage space

3. Preservation Period :

For determining the preservation period, the records are categorized into following five categories:

Category & Description	Period of Preservation
Records / documents with short reference value – i.e. Records which are to be preserved for a short period for enquiry, evidence, verification, evaluation, etc.	As per the Company’s retrieval needs
Records / documents required to be maintained as per statutory requirements and having higher reference value – i.e. records having contractual / legal implications which need to be preserved for a	For a period not less than 8 years (An indicative list of the documents is provided in Annexure I)

prescribed periods as per statutory requirement and records which need to be preserved for a particular period according to Company's own reference needs.	
Records which will have a permanent value for the Company even after the expiry of legal preservation period.	Permanent (An indicative list of the documents is provided in Annexure I)
Records which are required for adducing evidence in judicial or quasi judicial or other dispute redressal forum.	Till the time the matters are finally disposed of
Statutory records such as licenses, certificates, sanctions, approvals, etc. from Government / Statutory Bodies.	As per the specified guidelines / instructions of the authorities

The company may preserve and keep the above Records / documents either physically or in electronic form.

Further Regulation 30(8) of the Listing Regulations also refers to an archival policy as per which all events or information which has been disclosed to stock exchange(s) under regulation 30 shall be hosted on the website of the Company for a minimum period of five years and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per applicable provisions of Companies Act, 2013 certain documents must be preserved permanently or up to a certain prescribed time.

Accordingly this policy has been framed keeping in view particularly the requirements of Listing Regulations and the provisions of Companies Act, 2013.

4. Preservation Location:

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other secured cabinets.

5. Destruction of Records:

The records / documents preserved shall be reviewed every year or according to need by the respective department and action shall be taken to destroy those records which are due for disposal, subject to the approval of Chairman and Managing Director of the Company.

6. Responsibility:

The departmental head will be responsible for the maintenance, preservation and destruction of records pertaining to the respective Department

7. General:

In any circumstance, where the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over this Policy until such time as this Policy is changed to conform to the law, rule, regulation or standard.

8. Amendment:

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time and the decision of the Board in this respect shall be final and binding, subject to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

9. Disclosure:

This policy shall be uploaded on the website of the Company at <http://www.kirloskar-electric.com/investors/investors-information/policies.html>

Following documents shall be preserved permanently:

A. As per Companies Act, 2013

Sr. No	Nature of Document
1	All documents and Information originally filed with ROC for Incorporation of Company
2	Memorandum of Association and Articles of Association as originally filed and updated from time to time
3	Register of Members & Index of Members, Foreign Register of Members
4	Register of Debenture holders or any other security holder along with Foreign Registers & Index
5	Register of Renewed & Duplicate Share Certificates
6	Register of Charges
7	Register of Loans, Guarantee, Security and Acquisition made by the Company
8	Register of Investments not held in its own name by the Company
9	Register of Contracts with related party and contracts and bodies etc. in which directors are interested
10	Share Certificate forms and related books and documents
11	Minutes of General Meeting
12	Minutes of Board Meeting
13	Minutes of various Committee Meeting
14	Minutes of resolutions passed by Postal Ballot
15	Any other document as may be required to be maintained permanently as per the Act, Rules made thereunder and Secretarial Standards as applicable from time to time
16	Material Agreement/Contract
17	Order issued by Courts/Statutory Bodies

B. As per Listing Regulations

Sr. No	Nature of Document
1	Shareholding Pattern

2	Quarterly Financial Results
3	Annual Financial Results
4	Annual Report
5	Scheme of Arrangement
6	Voting Results by Shareholders
7	Yearly Disclosure of shareholding of Promoters
8	Any other document as may be required to be maintained permanently as per Listing Regulations and modifications thereto as applicable from time to time

Following documents shall be preserved for a period not less than 8 years

A. As per Companies Act, 2013

Sr. No	Nature of Document
1	Books of Accounts
2	Annual Returns along with all certificates / documents annexed thereto
3	Register of Deposits (<i>up to 8 years after repayment of Deposits</i>)
4	Instrument creating or modifying the charge (<i>up to 8 years after satisfaction of charge</i>)
5	All notices pertaining to disclosure of interest by directors
6	Attendance register of Board & Committee meetings
7	Any other document as may be required to be maintained for a period not less than 8 years as per the Act, Rules made thereunder and Secretarial Standards as applicable from time to time

B. As per Listing Regulations

Sr. No	Nature of Document
1	Statement under Grievance Redressal Mechanism
2	Corporate Governance Report
3	Statement of deviation or variation in use of issue proceeds
4	Compliance Certificate under Regulation 7(3)
5	Compliance Certificate by PCS under Regulation 40(9)
6	In-principle approval prior to issue of securities
7	Prior Intimations of Board Meeting for financial Results, Buyback, voluntary delisting

	etc. and alteration in nature of securities
8	Disclosure of Price Sensitive Information
9	Record date or Date of closure of transfer books
10	Record date for declaring dividend and /or cash bonus
11	Change in name of listed entity
12	Reconciliation of Share Capital Audit Report
13	Disclosures under Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders
14	Annual Information Memorandum
15	Any other document as may be required to be maintained for a period not less than 8 years as per Listing Regulations and modifications thereto as applicable from time to time

C. As per SEBI (Prohibition of Insider Trading) Regulations:

The Board of Directors or head(s) of the organization of every person required to handle unpublished price sensitive information shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings
