



HUBTOWN LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

[Effective from December 1, 2015]

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POLICY ON PRESERVATION OF DOCUMENTS
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1. PREAMBLE :

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter called 'the SEBI Listing Regulations, 2015'), every listed company shall frame a policy on preservation of documents, approved by the Board of Directors, classifying them in atleast two categories : (i) documents whose preservation shall be permanent in nature; and (ii) documents with preservation period of not less than eight years after completion of relevant transactions.

The Board of Directors of Hubtown Limited has in its meeting held on November 14, 2015, approved the following Policy of the Company for preservation of documents and records maintained by the Company either in physical mode or in electronic mode.

2. PURPOSE OF THE POLICY:

A policy on preservation of documents would ensure safe-keeping of the records and safeguard the documents from getting mishandled/misplaced/damaged, while at the same time avoiding superfluous inventory of documents.

The law require the Company to maintain certain types of corporate records of the Company either permanently or for a specified period of time. Failure to retain the records could subject the employees and the Company to penalties and fines, cause the loss of rights, obstruct justice, adversely impact potential evidence in a lawsuit, place the Company in contempt of court or seriously disadvantage the Company in litigation.

This Policy ensures that all the necessary documents and the records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy will serve as a guide for the employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

3. DEFINITIONS :

“**Act**” means the Companies Act, 2013.

“**Authorised Person**” means any person duly authorised by the Board of Directors of the Company.

“**Board**” means the Board of Directors of the Company.

“**Company**” means Hubtown Limited.

“**Compliance Officer**” means the Company Secretary of the Company who is responsible for the performance of duties under Regulation 6 of the Listing Regulations.

3. DEFINITIONS (contd.) :

“**Document**” means all business records of the Company in writing, printed and recorded matter and electronic form of records and includes summons, notices, requisitions, orders, declarations, forms and registers, whether issued, sent or kept in pursuance of the Companies Act, 2013, SEBI Act, 1992 or under any other law for the time being in force or otherwise maintained on paper or in electronic form.

“**Electronic Record**” means the electronic record as defined under clause (t) of sub-section (1) of Section 2 of the Information Technology Act, 2000.

“**Maintenance**” means keeping of documents either physically or in electronic form.

“**Preservation**” means to keep in good order and to prevent from being mishandled, stolen, damaged or destroyed.

“**Regulations**” or “**SEBI Listing Regulations, 2015**” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Any other term not defined herein shall have the same meaning as defined in the Regulations, the Companies Act, 2013 and the Rules made thereunder, Securities Contracts (Regulation) Act, 1956 or any other applicable law or regulations as applicable for the time being in force.

4. COVERAGE :

This Policy is applicable to all Departments and business functions of the Company and its associates, subsidiaries and joint ventures but does not apply to personal or non-business information.

5. ADMINISTRATION OF THE POLICY :

The Documents Preservation Schedule defined as the Initial Schedule for the maintenance, preservation and disposal of the documents is appended hereto as **Annexure – ‘A’**. This list of documents is illustrative and reference should be drawn from other relevant Acts / Rules / Regulations / Guidelines for other documents required to be maintained and preserved under various applicable legislation. The Company may, if feasible, preserve the Documents in electronic mode to ensure ease in maintenance of Documents and Records and for efficient/optimum utilisation of space. The electronic data shall be backed-up by the I. T. Department and the back-up files shall be kept at an offsite location.

The Compliance Officer of the Company shall be responsible for the administration of this Policy and the implementation process and procedure to ensure that the Documents Preservation Schedule is followed. The Compliance Officer is also authorised to make modification(s) to the Documents Preservation Schedule from time to time to ensure that the same is in compliance with the applicable statutes, rules and regulations as applicable from time to time and monitor compliance with this Policy.

6. PROCEDURE FOR DISPOSAL OF DOCUMENTS :

The Head of respective Departments may direct his/her employees in-charge to destroy the Documents pertaining to his / her Department which are no longer required as per the time schedule prescribed in **Annexure ‘A’**. The details of the Documents destroyed shall be recorded in the **Register for Disposal of Records** in the format prescribed in **Annexure - ‘B’** which is appended hereto.

7. SUSPENSION OF DISPOSAL OF DOCUMENTS IN THE EVENT OF LITIGATION OR CLAIMS :

In the event, the Company is served with a notice for Documents from any of the statutory/regulatory authorities or any litigation is commenced by or against the Company, then the disposal of the Documents which are subject matter of the notice / litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of.

8. AUTHENTICITY OF DOCUMENTS :

Where a Document is being maintained both in physical form and in electronic form, the authenticity with reference to the physical form should be considered for every purpose.

9. UNAUTHORISED RETENTION / DESTRUCTION :

Any premature destruction of records / documents is expressly prohibited. Under no circumstance should duplicates or drafts be retained longer than the official versions of the record. When records are approved for destruction, all copies in possession of employees in all media and formats must also be discarded.

10. METHOD OF DISPOSAL :

The documents marked for destruction, shall be destroyed as per the following guidelines :

- i. documents shall be destroyed by using shredders;
- ii. electronic data should be deleted from any memory source or other media and steps must be taken to make such data virtually impossible to retrieve.
- iii. draft of the documents that have been finalized should not be retained unless the HOD concerned advises otherwise.

11. COMMUNICATION OF THE POLICY :

A copy of this Policy shall be uploaded on the website of the Company.

12. AMENDMENTS TO THE POLICY :

The Board reserves the right to review this Policy periodically. Any or all of the provisions of this Policy shall be subject to revision / amendment in accordance with the Rules, Regulations, Circulars, Notifications, etc. on the subject as may be issued by relevant statutory authorities from time to time.

In case of any amendment(s), clarification(s), circular(s), etc. issued by the relevant authorities not being consistent with the provisions laid down in this Policy, then such amendment(s), clarifications(s), circular(s), etc. shall take precedence over the provisions of this Policy and this Policy shall stand amended from the date of specified in such amendment(s), clarifications(s) or circular(s).

13. EFFECTIVE DATE OF THE POLICY :

This Policy shall be effective December 1, 2015.

DOCUMENTS PRESERVATION SCHEDULE

The Documents preservation Schedule is as follows :

Type of Records :

- A. Corporate Records
- B. Accounts and Finance Records
- C. Tax Records
- D. Property Records
- E. Legal Files and Records
- F. Projects Records
- G. Personnel Records
- H. Insurance Records
- I. Correspondence and internal memos
- J. Electronic Documents including e-mail retention and back-up
- K. Miscellaneous Records

A : CORPORATE RECORDS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
	Documents to be retained permanently	
1.	Certificate of Incorporation	Permanent
2.	Certificate of change of name	Permanent
3.	Memorandum and Articles of Association	Permanent
4.	Common Seal	Permanent
5.	Minute Books of Board / Committee / General Meetings	Permanent
6.	Register of Members	Permanent
7.	Index of Members	Permanent
8.	Register of Investment in securities not held in the Company's name	Permanent
9.	Register of Charges	Permanent
10.	Register of Contracts or Arrangements in which Directors are interested (Section 189)	Permanent
11.	Register of Directors and Key Managerial Personnel and their shareholding (Section 170)	Permanent
12.	Register of Loans, Guarantees, Security provided and Investment (Section 186)	Permanent
13.	Register of Renewed and Duplicate Certificates	Permanent
14.	Register of Documents and Records destroyed	Permanent
15.	Share / Securities Transfer Registers	Permanent
16.	Register of Transmission of securities	Permanent
17.	Register / Forms / correspondence under SEBI Takeovers Regulations, 2011	Permanent
18.	Register / Forms / correspondence under SEBI Insider Trading Regulations, 2015	Permanent
19.	Court Orders / SEBI Orders	Permanent
20.	Annual Reports	Permanent

ANNEXURE – ‘A’

A : CORPORATE RECORDS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
	Documents to be retained for a minimum period of eight years	
1.	Register and Index of Debentureholders	15 financial years from the date of redemption of the debentures
2.	Scrutinizer's Report and copies of Postal Ballot Notices.	Until the resolution has been implemented or for a period of ten years, whichever is later.
3.	Office copies of notices of general meetings and other related papers	8 financial years
4.	Register of buy-back of Securities	8 financial years
5.	Register of Deposits	8 financial years
6.	Register of Directors' attendance	8 financial years
7.	Register of Proxies	8 financial years
8.	Register of Inspection	8 financial years
9.	Annual Returns and documents annexed thereto	8 financial years from the date of filing
10.	Attendance Register	8 financial years
11.	Office copies of notices of Board meetings, Committee meetings, agenda / notes of agenda and other related papers	8 financial years
12.	Consent and resignation letters received from Directors	8 financial years
13.	Declaration by Directors under section 164 of the Companies Act, 2013	8 financial years
14.	Declaration by Directors under Section 184 of the Companies Act, 2013	8 financial years
15.	Publication of notices and financial results in press	8 financial years
	Miscellaneous	
1.	ROC filings and Stock Exchange filings in physical and electronic form	5 years from the date of filing
2.	Legal Memoranda and Opinions	5 years after the closure of the matter
3.	Foreign Register of Members	Preserved until discontinued
B : ACCOUNTS AND FINANCE RECORDS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
	Documents to be retained permanently	
1.	Annual Audit Reports and Financial Statements	Permanent
	Documents to be retained for a minimum period of eight years	
1.	Book of Account, Ledgers, Vouchers, Bills, Invoices, Expense and MIS Records	8 years from the end of the financial year or completion of assessment under the Income Tax Act, whichever is later.
2.	Annual audit records, including working papers and other documents related to the audit.	8 financial years after completion of audit
3.	Register of Fixed Assets	8 financial years
4.	Bank Statements and cancelled cheques	8 financial years
5.	Investment Records	8 financial years
6.	Cost Records	8 financial years
7.	Loan documents	8 years (after repayment)
8.	Agreements pertaining to securities	8 financial years

B : ACCOUNTS AND FINANCE RECORDS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
	Miscellaneous	
1.	Security Deposit receipt copies	3 years after termination of the contract
2.	General Correspondence	3 financial years
3.	Annual Plans and Budgets	3 years after the budget year is closed
4.	Bank Guarantees	Till the expiry of the claim period
C : TAX RECORDS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
	Documents to be retained permanently	
1.	Annual Information Returns – State and Central	Permanent
2.	Tax Litigation documents / Tribunal Rulings	Permanent
.	Tax Exemption documents and related correspondence	Permanent
	Documents to be retained for a minimum period of eight years	
1.	Income Tax records	10 years from the end of the financial year or completion of assessment under Income Tax Act, whichever is later
2.	Service Tax records	10 years from the end of the financial year or completion of assessment under Service Tax Act, whichever is later
3.	Sales Tax records	10 years from the end of the financial year or completion of assessment under Service Tax Act, whichever is later
4.	Tax deducted at source record	10 years from the end of the financial year or completion of assessment under the applicable law, whichever is later.
5.	Tax Bills, Receipts, Statements	10 years from the end of the financial year or completion of assessment under applicable law, whichever is later.
6.	Payroll tax records	8 financial years
7.	Payment challans	8 financial years
D : PROPERTY RECORDS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
	Documents to be retained permanently	
1.	Land documents - Original Purchase and Sale Agreements	Permanent
2.	Property Card, Index II, Assessments, Ownership records issued by Government authorities	Permanent
3.	Property Insurance documents	Permanent
	Documents to be retained for a minimum period of eight years	
1.	Lease Agreements	8 years after the expiration of the lease

E : LEGAL FILES AND RECORDS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
	Documents to be retained permanently	
1.	Court Orders	Permanent
2.	Trademarks, Copy rights, licences	Permanent
	Documents to be retained for a minimum period of eight years	
1.	Contracts, Agreements and related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts
	Miscellaneous	
1.	Legal Memoranda and Opinions including subject matter files.	3 years after the close of the matter
2.	Litigation files	3 years after the close of the litigation.
F : PROJECTS RECORDS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
	Miscellaneous	
1.	Bills for payments to contractors	5 years from the date of completion of the project or from the date of final settlement of the bill, whichever is earlier.
2.	Project-wise Documents and related correspondence (including any proposal of the Project and its approval)	3 years from the date of completion of the project or till all liabilities/ claims to the client is settled, whichever is later
G : PAYROLL RECORDS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
	Documents to be retained for a minimum period of eight years	
1.	Bonus, Gratuity, Provident Fund and other Statutory Records	8 financial years
	Miscellaneous	
1.	Employee deduction authorisation	3 years after separation
2.	Payroll deductions	3 years after separation
3.	Details regarding gratuity and retiral disbursements	3 years after separation
4.	Payroll Registers	3 years after separation
5.	Unclaimed salary records	3 years
6.	Employees Information Records	3 years after separation
7.	Employees Medical Records	3 years after separation
8.	Attendance records, application forms, promotion records, performance evaluation, etc.	3 years after separation
9.	Correspondence with employment agencies, advertisements for job openings.	3 years
10.	Employment contracts	3 years after separation
11.	Leave Records (current)	2 years after the relevant period.
12.	Time Sheets (current)	2 years after the relevant period

H : INSURANCE RECORDS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
	Documents to be retained permanently	
1.	Master Policies and related documents	Permanent
	Documents to be retained for a minimum period of eight years	
1.	Journal entry support data	8 financial years
2.	Inspection Reports	8 financial years
	Miscellaneous	
1.	Claims Records	2 years after the settlement of the claims
2.	Insurance policies for movable / immovable assets, vehicles, etc.	2 years from the date of expiry. However, in case of any pending claims in respect of such policies, the same shall be preserved till the settlement of such claims.
3.	Group Insurance Plans	Until the Plans are amended or terminated
I : CORRESPONDENCE AND INTERNAL MEMOS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
1.	Those pertaining to Non-routine matters or having significant lasting consequences	Permanent
2.	Those pertaining to routine matters and having no significant impact or lasting consequences	3 years
3.	<i>Generally, most correspondence should be retained for the same period as the documents they pertain to or support.</i>	

J : ELECTRONIC RECORDS		
SR. NO.	DOCUMENT / RECORD TYPE	PRESERVATION PERIOD
1.	All e-mails received from internal and external sources that are important and have significant impact and lasting consequences	Permanent
2.	All e-mails received from internal and external sources that are not important and have no significant impact and lasting consequences	2 years
3.	Employees will take care not to send proprietary or confidential internal e-mails to outside sources.	
4.	Employees will not store or transfer the Company related e-mails on non-work related computers without the approval of their HOD.	
5.	The Company does not automatically delete electronic files beyond the date specified in the Policy. It is the responsibility of all employees to adhere to the guidelines specified in this Policy. At regular intervals, the Company will run back-up of all electronic files including e-mails on servers. The back-up copy is considered a safeguard for the record retention system of the Company. In certain cases, the document(s) will be maintained in both – physical and electronic form.	
6.	PDF Documents may be preserved for a maximum of 5 years. The documents may be destroyed depending upon the completion of the job or its use coming to an end	
7.	All word / excel / power point files may be deleted once a year depending upon its importance or the lack of it.	
8.	Web page files to be preserves for a period of 5 years as specified in SEBI Listing Regulations, 2015. Thereafter, the I.T. Department will archive the same for a period of 3 years after the initial period of five years of live page.	

REGISTER FOR DISPOSAL OF RECORDS

Sr. No.	Particulars of Documents destroyed	Date of Destruction	Mode of Destruction	Initials of the Authorised Person