

Policy on Preservation of Documents and archival of documents in its website

1. Purpose and Scope

The purpose of this documents is to present a high level policy statement for Hatsun Agro Product Limited (HAPL) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 and in accordance with the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

The policy is intended to define HAPL’s preservation of documents responsibilities and to provide guidance to the executives and staff working in Hatsun Agro Product Limited in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frame the guidelines for fundamental accountability of Hatsun Agro Product Limited to retain and preserve its documents as the basis for communication with a range of external stakeholders.

The policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. The policy would contain guidelines on how to identify documents that need to be maintained, how long certain documents should be retained, how and when those documents should be disposed of, if no longer needed and how the documents should be accessed and retrieved when they are needed.

This policy was approved by the Board of Directors through Circular Resolution passed on 30th November 2015.

2. Statutory Mandate

The policy on preservation of documents and archival is mandated by the provisions of regulation 9 of Chapter III of LODR, 2015. Under this regulation, the Company has a strategic objective of ensuring that significant documents are safeguarded and preserved to ensure its longevity of priority documents including its electronic resources.

3. Classification of Documents to be preserved /retained

Based on the recommendation of the management of the Company, the Board of Directors have classified the documents into various categories to be retained and preserved based on the legal requirements and characteristics of documents .

- A) Documents that need to be preserved / retained permanently – Doc 1
- B) Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR – Doc2
- C) Documents to be preserved electronically and archived when necessary – Doc 3.

- D) Documents that may be required for judicial proceedings and which may be destroyed after closure of the legal case – Doc 4.
- E) Emails of all employees in the grade M3 (E6) and above for a period of 3 years – Doc 5.
- F) Documents like budget papers etc., which may be retained for less than 8 years – Doc 6.

4. Principle of Responsibility of Employees for Preservation of Documents

All the Employees in the permanent rolls of the Company are responsible for preservation of documents and have to take into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area. Such policy bestowing responsibility on the Company's employees would immensely help company's litigation preparedness and will be a tool helping the Company's and Outside legal counsel to track down documents to handle the legal cases.

5. Periodical Review of the Policy by Top Management

The Policy is flexible and is easy to understand and has to be complied by all levels of employees. The policy will be reviewed periodically by the Top Management of the company and amendments will be effected to subject to approval of the Board if and when practical difficulties are encountered. The Top management may also review this policy on document retention considering compliance requirements under any local, state, central legislations that may be promulgated from time to time.

6. Administration

The Retention Schedule approved by the Board of Directors of HAPL for initial maintenance, retention and disposal schedule of records is as given in the appendix to this policy.

7. Suspension of Record Disposal in the event of Litigation or Claims

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning HAPL or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management with the due advice from the legal counsel determine otherwise. The Top Management in such case shall inform all the employee by mail under "Userlist" of the need to retain the documents and regarding suspension of disposal of the same.

- 8. This policy was approved by the Board of Directors through Circular Resolution passed on 30th November 2015.

APPENDIX

Nature of Records of the company

1. Accounting and Finance records including Annual Financial statements
2. Insurance Records
3. Tax records
4. Contracts entered into by the Company including Marketing Contracts
5. Secretarial Records including Certificate of Incorporation, Listing Agreement and other approvals/ correspondences with authorities relating to capital markets, Ministry of corporate Affairs .
6. Legal Files relating to litigations and Records relating to litigations
7. Property Records
8. Payroll Records
9. Pension and retiral related Records
10. Personnel and Human Resource Records
11. Programs & Service Records
12. Sponsorship Projects related Records
13. Corporate Social Responsibility related Records
14. Correspondences with statutory authorities, third parties and correspondences with in the organisation
15. Electronic Documents including email retention and backup
16. Miscellaneous Records

1. Accounting and Finance records including Annual Financial statement

Record Type	Category of Document as referred in point no 3 of this policy	Retention Period
Accounts Payable ledgers and schedules	Doc -2	8 Years
Accounts Receivable ledgers and schedules	Doc – 2	8 Years
Annual Audit Reports and Financial Statements	Doc – 1	Permanent
Annual Audit Records, including work papers and other documents that related to the audit	Doc - 2	8 years after completion of audit
Annual Plans and Budgets	Doc – 6	3 years after the budget year is closed
Bank Statement and Cancelled Cheques	Doc – 2	8 years
Employee Expense Reports	Doc – 2	8 years
General Ledger including Ledgers relating to Journals made by the company	Doc – 1	Permanent
Interim Financial Statements	Doc – 2	8 years
Notes Receivable ledgers and schedules	Doc – 2	8 years
Investment Records and related journals	Doc – 1	Permanent
Security deposit receipt copies	Doc - 6	3 years after termination of the contract
Journal Vouchers , cash voucher , bank voucher and vouchers of all types		

Responsibility : FINANCE AND ACCOUNTS DEPARTMENT

2. Insurance Records

Record Type	Document Type	Retention Period
Annual Loss Summaries	Doc -2	8 Years
Audits and Adjustments	Doc – 2	8 Years
Claim Files (Including correspondence, medical records, injury documentation, etc.	Doc – 1	Permanent
Group Insurance Plans – Active	Doc – 2	8 years

Employees		
Group Insurance Plans - Retireees	Doc – 1	Permanent
Insurance Policies for the Company	Doc – 1	Permanent
Journal Entry Support Data	Doc – 2	8 years
Releases and Settlements	Doc - 1	Permanent

Responsibility : FINANCE AND ACCOUNTS DEPARTMENT

3. Tax records

Record Type	Document Type	Retention Period
Tax-Exemption Documents and related correspondence	Doc -1	Permanent
Excise Tax records	Doc – 1	Permanent
Payroll Tax records	Doc – 2	8 years
Tax Bills, Receipts, Statements	Doc – 2	8 years
Tax Returns – Income, Franchise, Property	Doc – 1	Permanent
Tax workpaper packages - Originals	Doc – 2	8 years
Sales Tax Records	Doc – 2	8 years
Annual Information Returns – State and Central	Doc – 1	Permanent
Service Tax Records	Doc – 1	8 years

Responsibility : FINANCE AND ACCOUNTS DEPARTMENT

4. Contracts entered into by the Company including Marketing Records

Record Type	Document Type	Retention Period
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents)	Doc – 2	8 years

Responsibility -- LEGAL AND MARKETING DEPARTMENT

5. Secretarial Records including Certificate of Incorporation, Listing Agreement and other approvals/ correspondences with authorities relating to capital markets, Ministry of corporate Affairs .

Record Type	Document Type	Retention Period
Corporate Records (certificate of incorporation, commencement of business, listing agreement, common	Doc – 1	Permanent

seal, minutes book of board, general meeting and committees thereof, annual reports originals, statutory registers to be maintained under Companies Act and SEBI regulations etc.)		
Licence and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Doc – 1	Permanent
ROC Filings and Stock Exchange filings in physical and Electronic form	Doc - 6	8 years from the date of filing
Correspondences with Authorities		
Various Approvals from stock exchanges		
Documents and declaration regarding insider trading received from connected persons		
Declaration from promoters regarding SEBI (SAST) regulations		
Disclosure of Interest received from directors		
Declaration from Independent directors		
Agenda of Board Meeting		
Correspondence with depositories		

Responsibility -- SECRETARIAL DEPARTMENT

6. Legal Files relating to litigations and Records relating to litigations

Record Type	Document Type	Retention Period
Legal Memoranda and Opinions	Doc – 4	3 years after the closure of the matter
Litigation files	Doc – 4	1 year after expiration of disposal of the case
Court Orders	Doc – 1	Permanent

Responsibility : LEGAL AND SECRETARIAL DEPARTMENT

7. Property Records

Record Type	Document Type	Retention Period
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Doc – 1	Permanent

Original Purchase / Sale Deeds	Doc – 1	Permanent
Original Lease Agreements	Doc – 6	3 years after expiration of the lease

Responsibility : LEGAL AND SECRETARIAL DEPARTMENT

8. Payroll Records

Record Type	Document Type	Retention Period
Employee Deduction Authorization	Doc – 6	3 years after termination of service of employment
Payroll Deductions	Doc – 6	3 years after termination of service of employment
Labour Distribution Cost Records including details regarding gratuity and retiral disbursements	Doc – 6	3 years after termination of service of employment
Payroll Registers (Gross and Net)	Doc – 6	3 years after termination of service of employment
Time Cards / Sheets	Doc – 6	2 years
Unclaimed Wage Records	Doc – 6	3 years
Leave Records	Doc - 6	2 years after the relevant period

Responsibility -- HUMAN RESOURCES DEPARTMENT

9. Pension and retiral related Records

Record Type	Document Type	Retention Period
Retirement and Pension Records	Doc – 1	Permanent

Responsibility -- HUMAN RESOURCES DEPARTMENT

10. Personnel and Human Resource related Records

Record Type	Document Type	Retention Period
Personnel Files of individual employees	Doc – 1	Permanent

Commission / Bonuses / Incentives / Awards	Doc – 2	8 years
Employee Earnings Records	Doc – 6	3 years after termination of service of employment
Employee Handbook & Induction Manual	Doc – 1	Permanent
Employee Medical Records	Doc – 6	3 years after termination of service of employment
Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers	Doc – 6	3 years after termination of service of employment
Employment Contracts - Individual	Doc – 6	3 years after termination of service of employment
Correspondence with Employment Agencies and Advertisements for job openings	Doc – 6	3 years
Job Description	Doc – 6	3 years after superseding the earlier document

Responsibility -- HUMAN RESOURCES DEPARTMENT

11. Programs & Service related Records

Record Type	Document Type	Retention Period
Attendance Records	Doc – 6	3 years
Program statistics, etc,	Doc – 6	3 years
Research & Publications	Doc – 1	Permanent

Responsibility -- HUMAN RESOURCES DEPARTMENT

12. Sponsorship Projects related Records

Record Type	Document Type	Retention Period
Sponsorship agreements	Doc – 1	Permanent

Responsibility -- HUMAN RESOURCES DEPARTMENT

13. Corporate Social Responsibility related Records

Record Type	Document Type	Retention Period
Records on CSR Projects(including amount budgeted, spent and balance if any) projects undertaken and progress thereon	Doc – 1	Permanent

Responsibility -- HUMAN RESOURCES DEPARTMENT

14 Correspondences with statutory authorities other than those mentioned in this policy above, third parties and correspondences with in the organisation

General Principle : Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract

1. Those pertaining to routine matters and having no significant, lasting consequences should be discarded within two years.
2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

Responsibility -- RESPECTIVE DEPARTMENT

15. Electronic Documents including email retention and back up

1. Electronic Mail : Not all email needs to be retained, depending on the subject matters
 - All e-mail – from internal and external sources to be deleted after 24 months.
 - Staff will strive to keep all but an insignificant minority of their email related to business issues.
 - Central I.T team would archive email for six months after the staff has deleted it after which time the email will be permanently deleted.
 - Staff will not store or transfer the Company related emails on non-work related computers except as necessary or appropriate with due approvals from the Central IT team and the respective Managers.

- Staff will take care not to send confidential / proprietary information to outside sources.
- Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employees' workplace.

Responsibility -- RESPECTIVE DEPARTMENT

Document Type : Doc 5

2. Electronic Documents including PDF files.

- PDF documents – Can be a maximum period of 8 years. But the said document may be destroyed depending upon the completion of the job or its use coming to an end.
- Text/ Formatted files : All word / excel / Power point files may be deleted once every year depending on the importance or lack of it.

Document Type : Doc – 3

Responsibility -- INFORMATION TECHNOLOGY DEPARTMENT

3. Web page files

- May be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015.
- May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial period of five years of live page.

Document Type : Doc – 3

Responsibility : INFORMATION TECHNOLOGY DEPARTMENT

16. Miscellaneous Records

Record Type	Retention Period	Document Type
Consultant Reports	3 years	Doc – 6
Policy and procedures manuals – Original	Current version with revision history	Doc – 6
Policies and procedures manuals – Copies	Retain current version only	Doc – 6
Dealership agreements	Current version with revision history	Doc – 6
Annual Reports	Permanent	Doc -1
Other documents not covered in any category of documents above		