

## **Preservation of Documents Policy**

### **1. OBJECTIVE AND SCOPE**

The purpose of this Policy to present a statement of Igarashi Motors India Limited ('IMIL') 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 IMIL's preservation of documents responsibilities and to provide guidance to the employees working in IMIL 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 IMIL 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 has been adopted and approved by the Board of Directors at its meeting held on November 05, 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 following documents to be retained and preserved for posterity.

- a) Documents that need to be preserved / retained permanently – marked as RDP1
- b) Documents to be preserved electronically and archived when necessary – marked as RDP2.
- c) Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR – marked as RDP3
- d) Documents like budget papers etc., which may be retained for less than 8 years – marked as RDP4.
- e) Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case – marked as RDP5.

The illustrative list is appended as Annexure 1.

#### **4. Responsibility of Employees for Preservation of Documents**

All the Employees are responsible for taking 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 of work.

#### **5. Periodical Review of the Policy by Managing Director and CFO**

The policy shall be reviewed periodically by the Managing Director and CFO and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The Managing Director and CFO may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time. The Managing Director and CFO along with respective Business Head/Function would identify time period for retention of documents from time to time.

#### **6. 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 IMIL or commencement of any litigation against the Company, such employee shall inform the Managing Director, CFO and Company Secretary for any further disposal of documents shall be suspended until such time as the Managing Director and CFO with the due advice from the legal counsel determine otherwise.

#### **7. Back-up Copies**

In the event of major incident, the first priority is the safety of the people, followed by immediate action to rescue or prevent further damage to the records. Depending on the immediate threat, emergency response and recovery actions will take precedence over all other Company activities.

The Company has made appropriate provision for the backup of its digital collections, including the provision of offsite security copies. The backup copies are actively maintained to ensure their continued viability.

#### **9. This policy comes into effect from November 05, 2015.**

## Annexure 1

### Type of Records

#### 1. Accounting and Finance records including Annual Financial statement

Record Type	Retention Period	Document Type
Accounts Payable ledgers and schedules	8 Years	RDP-3
Accounts Receivable ledgers and schedules	8 Years	RDP-3
Annual Audit Reports and Financial Statements	Permanent	RDP-1
Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit	RDP-3
Annual Plans and Budgets	3 years after the budget year is closed	RDP-4
Bank Statement and Cancelled Cheques	8 years	RDP-3
Employee Expense Reports	8 years	RDP-3
General Ledger	Permanent	RDP-1
Interim Financial Statements	8 years	RDP-3
Notes Receivable ledgers and schedules	8 years	RDP-3
Investment Records	Permanent	RDP-3
Security deposit receipt copies	3 years after termination of the contract	RDP-4

#### 2. Insurance Records

Record Type	Retention Period	Document Type
Annual Loss Summaries	8 Years	RDP-3
Audits and Adjustments	8 Years	RDP-3
Claim Files (Including correspondence, medical records, injury documentation, etc.	Permanent	RDP-1
Group Insurance Plans – Active Employees	8 years	Doc – 2
Group Insurance Plans - Retireees	Permanent	RDP-1
Insurance Policies for the Company	Permanent	RDP-1
Releases and Settlements	Permanent	RDP-1

#### 3. Tax records

Record Type	Retention Period	Document Type
Tax-Exemption Documents and related correspondence	Permanent	RDP-1
Payroll Tax records	8 years	RDP-3
Tax Bills, Receipts, Statements	8 years	RDP-3
Tax Returns – Income, Franchise, Property	Permanent	RDP-1
Tax workpaper packages - Originals	8 years	RDP-3
Sales/VAT Tax Records	8 years	RDP-3
Annual Information Returns – State and Central	Permanent	RDP-1
Service Tax Records	8 years	RDP-3
SEZ Documents	Permanent	RDP-1

4. Contracts entered into by the Company - 8 years /RDP-3
5. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities.

Record Type	Retention Period	Document Type
Corporate Records (certificate of incorporation, commencement of business, listing agreement, common seal, minutes book of board and committees thereof, annual reports originals, etc.)	Permanent	RDP-1
Licence and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanent	RDP-1
ROC Filings and Stock Exchange filings in physical and Electronic form	5 years from the date of filing	RDP-4

6. Legal Files and Records – permanent – RDP-1
7. Property Records– permanent – RDP-1
8. Production Records - 8 years – RDP-3
9. Payroll, Personnel and HR Records – permanent – RDP-1
10. Pension and retiral related Records - permanent – RDP-1
11. Miscellaneous Records – 8 years – RDP-3