

## **POLICY FOR PRESERVATION OF DOCUMENTS**

### **FLAGSHIP DEVELOPERS PRIVATE LIMITED (FDPL)**

#### **1. PURPOSE AND SCOPE:**

The purpose of this documents to present a policy statement for **Flagship Developers Private Limited (FDPL)** 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 FDPL’s preservation of documents responsibilities and to provide guidance to the executives and staff working in FDPL in making decisions and undertaking other activities that may have an impact on the operations of the Company. It also frames the guidelines for fundamental accountability of FDPL 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.

#### **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
- b. Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR.

#### **4. PRINCIPLE OF RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS**

All the Employees in the permanent rolls of the Company 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.

#### **5. PERIODICAL REVIEW OF THE POLICY BY TOP MANAGEMENT:**

The Policy should be flexible and easy to understand and comply with by all levels of employees. The policy should be reviewed periodically by the Top Management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The Top management may also review the policy on document retention to comply with any local, state, central legislation that may be promulgated from time to time.

#### **6. ADMINISTRATION:**

The Record Retention Schedule approved by the Board of Directors for initial maintenance, retention and disposal schedule for physical records is as given in the annexure.

#### **7. BOARD'S APPROVAL:**

This policy was approved by the Board of Directors at its meeting held on 01<sup>st</sup> December, 2015.

#### **TYPE OF RECORD**

1. Accounting and Finance records including Annual Financial statement

2. Insurance Records
3. Tax records
4. Contracts entered into by the Company including Marketing Contracts
5. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities
6. Legal Files and Records
7. Property Records
8. Payroll Records
9. Pension and retiral related Records
10. Personnel and HR Records
11. Programs & Service Records
12. Sponsorship Projects Records
13. Corporate Social Responsibility Records
14. Electronic Documents including email retention and back up
15. Miscellaneous Records

## **1. ACCOUNTING AND FINANCE RECORDS INCLUDING ANNUAL FINANCIAL STATEMENT**

<b>Record Type</b>	<b>Retention Period</b>
Accounts Payable ledgers and schedules	8 Years
Accounts Receivable ledgers and schedules	8 Years
Annual Audit Reports and Financial Statements, Tax and Vat Audit	Permanent
Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit
Annual Plans and Budgets	3 years after the budget year is closed
Bank Statement and Cancelled Cheques	8 years
Employee Expense Reports	8 years
General Ledger	Permanent

Interim Financial Statements	8 years
Notes Receivable ledgers and schedules	8 years
Investment Records	Permanent
Security deposit receipt copies	3 years after termination of the contract
Fixed Asset Register with supporting Purchase Orders and Bills for fixed assets addition	Permanent
Cost records	8 years
Payroll extract, salary advice and payroll JVs	8 years
Payroll TDS, PF, ESI return and challan applicable on payroll	Permanent
Treasury documents – Credit approvals from bank	Permanent
Bank Account passbook or statement, Bank Reconciliation Statement and LC Documents	8 years
Bank Guarantees	Till the expiry of the claim period
Tax Litigation documents	Permanent
Bill of entries	Permanent

## 2. INSURANCE RECORDS

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

Insurance Policies for the Company	Permanent
Journal Entry Support Data	8 years
Releases and Settlements	Permanent

### 3. TAX RECORDS

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

**Responsibility : FINANCE AND ACCOUNTS DEPARTMENT**

### 4. CONTRACTS ENTERED INTO BY THE COMPANY INCLUDING MARKETING RECORDS

<b>Record Type</b>	<b>Retention Period</b>
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents)	8 years

**Responsibility : LEGAL AND MARKETING DEPARTMENT**

### 5. CORPORATE RECORDS INCLUDING CERTIFICATE OF INCORPORATION, LISTING AGREEMENT AND OTHER APPROVALS FROM OTHER STATUTORY

**AUTHORITIES.**

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

**Responsibility : LEGAL AND SECRETARIAL DEPARTMENT**

**6. LEGAL FILES AND RECORDS**

<b>Record Type</b>	<b>Retention Period</b>
Legal Memoranda and Opinions	3 years after the closure of the matter
Litigation files	1 year after expiration of disposal of the case
Court Orders	Permanent

**Responsibility : LEGAL AND SECRETARIAL DEPARTMENT**

**7. PROPERTY RECORDS**

<b>Record Type</b>	<b>Retention Period</b>
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent
Original Purchase / Sale Deeds	Permanent
Original Lease Agreements	3 years after expiration of the lease

**Responsibility : LEGAL AND SECRETARIAL DEPARTMENT****8. PAYROLL RECORDS**

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

**Responsibility : HUMAN RESOURCES DEPARTMENT****9. PENSION AND RETIRAL RELATED RECORDS**

<b>Record Type</b>	<b>Retention Period</b>
Retirement and Pension Records	Permanent

**Responsibility : HUMAN RESOURCES DEPARTMENT****10. PERSONNEL AND HR RECORDS**

<b>Record Type</b>	<b>Retention Period</b>
Personnel Files of individual employees	Permanent
Commission / Bonuses / Incentives / Awards	8 years

Employee Earnings Records	3 years after termination of service of employment
Employee Handbook & Induction Manual	Permanent
Employee Medical Records	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	3 years after termination of service of employment
Employment Contracts – Individual	3 years after termination of service of employment
Correspondence with Employment Agencies and Advertisements for job openings	3 years
Job Description	3 years after superseding the earlier document

**Responsibility : HUMAN RESOURCES DEPARTMENT**

## **11. PROGRAMS & SERVICE RECORDS**

<b>Record Type</b>	<b>Retention Period</b>
Attendance Records	3 years
Program statistics, etc.	3 years
Research & Publications	Permanent

**Responsibility : HUMAN RESOURCES DEPARTMENT**

## **12. SPONSORSHIP PROJECTS RECORDS**



<b>Record Type</b>	<b>Retention Period</b>
Sponsorship agreements	Permanent

**Responsibility : HUMAN RESOURCES DEPARTMENT**

### **13. CORPORATE SOCIAL RESPONSIBILITY RECORDS**

<b>Record Type</b>	<b>Retention Period</b>
Records on CSR Projects(including amount budgeted, spent and balance if any) projects undertaken and progress thereon	Permanent

**Responsibility : HUMAN RESOURCES DEPARTMENT**

### **14. ELECTRONIC DOCUMENTS INCLUDING EMAIL RETENTION AND BACK UP**

**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
- 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 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 employee's workplace

**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

### **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

### **Responsibility : IT DEPARTMENT**

#### **16. Miscellaneous Records**

<b>Record Type</b>	<b>Retention Period</b>
Consultant Reports	3 years
Policy and procedures manuals – Original	Current version with revision history
Policies and procedures manuals – Copies	Retain current version only
Dealership agreements	Current version with revision history
Annual Reports	Permanent
Export Documentation – FIRC details	Permanent
Import Documentation	Permanent

### **Responsibility : RESPECTIVE DEPARTMENT**