

THE INDIAN CARD CLOTHING COMPANY LIMITED

(CIN : L29261PN1955PLC009579)

DOCUMENT RETENTION AND DESTRUCTION POLICY

1. LEGAL FRAMEWORK

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all listed entities, one of the common obligations for all listed entities pursuant to Regulation 9 being to formulate and put in place a policy for preservation of documents.

The Board of Directors (The “Board”) of The Indian Card Clothing Company Limited (the “Company”) has adopted the following policy regarding retention of documents and its destruction.

The Board may review and amend this policy from time to time. This Policy will be applicable to the Company with effect from December 1, 2015 in terms of Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”).

2. DEFINITIONS

a) “Board of Directors” or “Board”

Board of Directors or Board shall mean the Board of Directors of The Indian Card Clothing Company Limited, as constituted from time to time.

b) “Company”

Company shall mean “**The Indian Card Clothing Company Limited**”.

c) “Documents”

Documents shall mean all papers, records, files, books, tapes, CDs, DVDs, electronic storage devices etc., and the like as required to be maintained under any law or regulation for the time being in force.

d) “Listing Regulations”

Listing Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”).

3. OBJECTIVE

The objectives of the Policy include (a) retention and maintenance of documents necessary for proper functioning of the Company as well as to comply with applicable legal requirements; (b) destruction of documents which no longer need to be retained; and (c)

guidance for the Board of Directors, officers, staff and other persons with respect to their responsibilities concerning document retention and destruction.

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- A. The documents of a permanent nature (listed in **Annexure – I**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions, deletions in the documents shall also be preserved permanently by the Company.

- B. The documents to be maintained and preserved for a specified time period after completion of the relevant transactions (listed in **Annexure – II**) shall be preserved by the Company for the term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, additions, deletions or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

Provided further that the Company may keep the documents as specified above in an electronic mode.

4. ROLES & RESPONSIBILITIES

The respective Departmental Heads of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them, in terms of this policy.

The Departmental Heads shall discuss with staff the ways in which documents are created or generated. With respect to each employee or function, the Departmental Head shall attempt to determine whether the documents can be easily segregated from others, so that, when it comes time to destroy or retention of those documents, they can be easily separated from the others for disposition.

Documents shall be stored in a safe and accessible manner. Documents which are necessary for the continued operation of the Company in case of an emergency shall be regularly duplicated or backed up and maintained at a place which is outside / at remote location.

5. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both Physical and Electronic Documents.

6. COMMUNICATION AND DISSEMINATION OF THE POLICY

A copy of this policy shall be posted on the web-site of the Company.

7. AMENDMENTS

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

8. GENERAL

Notwithstanding anything contained in this policy, the Company shall ensure compliance with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

ANNEXURE – I

DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE

Sr. No	Nature of Document(s)
01	Registration Certificates
02	Memorandum of Association and Articles of Association
03	Licenses & Statutory Approvals
04	Statutory Registers required under applicable laws
05	Audited financial statements
06	Minutes of General Meeting
07	Minutes of Board Meeting
08	Minutes of various Committee Meetings
09	Investment Documents/proofs including certificates etc.
10	Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

ANNEXURE – II

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS

Sr. No.	Nature of Document(s)
01	Books of Accounts
02	Annual Return(s)
03	Personnel Documents
04	Insurance Policies/ Claims under various policies
05	Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.