



PRESERVATION OF DOCUMENTS POLICY

WINDSOR MACHINES LIMITED

[CIN: L99999MH1963PLC012642]

REGISTERED OFFICE:
102/103, Devmilan Co. Op
Housing Soc., Next to Tip Top
Plaza, L.B.S. Road Thane West,
Maharashtra -400604.

1. PREAMBLE:

The Securities and Exchange Board of India Listing Obligations and Disclosure Requirements Regulations, 2015 (“LODR Regulations”) require listed companies to have a policy for preservation of documents, approved by its board of directors, classifying them in at least two categories as follows-

- a) Documents whose preservation shall be permanent in nature;
- b) Documents with preservation period of not less than eight years after completion of the relevant transactions.

This Policy is framed in accordance with the above requirements of the LODR Regulations, notified on 2nd September 2015 and other SEBI Circulars specified in this regard, if any. This policy shall be effective from 1st December 2015 being the date when the LODR Regulations become effective.

This Policy is in conjunction with any extant policy of the corporation in the matter of Preservation of Documents / Records Retention and also subject to the provisions of other laws viz., Right to Information Act, 2005, The Public Records Act, 1993 etc., as applicable.

Terms that have not been defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

2. OBJECTIVE:

The objective of this Policy is ‘aiding employees of the Company in understanding their obligations in retaining physical documents and electronic documents’.

The policy is formulated to manage the Company’s information in a structured manner, to retain information for as long as it has a business purpose, to satisfy statutory or regulatory requirements, and to protect information which is vital to the Company.

3. SCOPE:

This policy covers all information created, received, managed and retained by the Company (including all its units and divisions), in hard copy and electronic records.

Information, under this policy, includes all hard copy and digital information created or received in connection with the business of the Company including originals and copies of correspondence, recordings, work papers, video tapes, photographs, product specifications, reports etc.

This policy extends to all locations of the Company. Particular departments, units or divisions may develop policies applicable to that specific departments, units or divisions, to meet regulatory requirements.

4. RESPONSIBILITY:

It is the responsibility of respective Sector Presidents /the heads of all departments to assure the implementation of this Policy, in terms of managing the records and information of their respective Sector or department, as the case may be. This responsibility may be delegated to an assigned employee, not being below the Grade of ‘Manager’ who would be responsible for developing the listing of records and their respective preservation schedules along with its regular Updation.

It follows that the concerned responsible officer should, in line with this Policy and as per applicable law:

- destroy papers and electronic data for which there is no continuing business need and send papers that should not be destroyed to archive within as short a time as possible
- keep data secure while it remains in any office
- keep track of where information is stored
- continue to apply these good practices to avoid stockpiling of papers in the future.

A database of all archived materials should be stored at each department level. The records which are confidential in nature, should have selected access as may be determined by the Sector President/Head of Department.

5. POLICY:

RETENTION SCHEDULES:

All Sectors and corporate functions shall specify the manner of maintenance of records (physical/electronic), recommended minimum retention periods, safety safeguards and protocols for maintenance of inventory of records pertaining to them.

The retention periods will be determined by factors such as the information's useful life within the Company, requirements of applicable law and requirements of regulatory bodies.

The Companies Act, 2013 ("the Act") and Secretarial Standard - 1 provide a period upto which certain documents / registers are to be preserved. The Company shall ensure that maintenance of these documents are in line with the period mentioned in the Companies Act, 2013 and Secretarial Standard - 1 as amended from time to time, except in so far as may be mandated for a longer period by any other law applicable for the time being in force. Given below in **ANNEXURE A** are certain documents and their preservation period under the Act/Secretarial Standard-1.

In respect of documents for which no retention period is mandated by law, the retention periods will be approved by the respective Sector Presidents / Head of Department.

Retention schedules for each department will specify how long each type of record will be kept and when it will be destroyed.

Records shall be broadly classified as per following for retention:

- **PERMANENT RECORD:** Permanent records are records which are of strategic importance and vital to the organization. These records shall be kept permanently, e.g. records and documents such as Memorandum and Articles of Association, Board and Committee Minutes, Registers which are required to be permanently maintained under the Companies Act or other applicable laws.
- **OTHER RECORDS:** Such records as are required to be maintained for minimum 8 years on account of statutory considerations and are important from the perspective of financial record keeping, e.g. books of accounts, vouchers, Financial Statements, invoices and all deeds / agreements which are the basis for the financial transactions should be preserved for minimum 8 years from the closure of the contract.

- **TEMPORARY RECORDS:** Temporary records are the records which are required to be retained as long as it has a business purpose or are required to be retained as per relevant business regulations e.g. Operational documents such as rating letters, research reports, working papers, etc.

DESTRUCTION OF RECORDS:

The records which are no longer required after the statutory retention period should be reviewed and destroyed under instructions of the Head of the Department, in compliance with the applicable record. The instruction for the destruction of the record must be provided in writing by the Head of the Department. In the event the Company is served with any Notice for documents from any of the Statutory Authorities or any Litigation is commenced by or against the Company, than the disposal of documents which are subject matter of Notice/Litigation, etc. shall be suspended till such time the matter is settled or resolved or disposed of. The Administrator shall immediately inform the respective Employee(s) of the Company for suspension of further disposal of Documents.

The Documents of the Company which are no longer required as per the time schedule prescribed in the **ANNEXURE B** may be destroyed. which are no longer required as per the Documents Preservation Schedule given under Appendix A. The details of the Documents destroyed by the Company shall be recorded in the Register for Disposal of Records to be kept by Employees who are disposing of the Documents in the format prescribed at **APPENDIX B**.

RECORD MANAGEMENT PROCEDURE:

Each business unit and corporate function shall assure that records maintained in its offices, or stored outside the office environment are appropriately identified and maintained to assure accurate and prompt retrieval.

COMMUNICATION OF THIS POLICY:

This Policy shall be handed over/circulate to the respective Department Heads of both units the Company within reasonable time of the adoption of this Policy by the Board of Directors of the Company.

Any questions and clarifications relating to this Policy should be addressed to the Company Secretary at cs@windsormachines.com.

6. SCOPE LIMITATION:

In the event of any conflict between the provisions of this Policy and of the LODR Regulations, 2015 / Companies Act, 2013 or any other statutory enactments, rules, the provisions of such Regulations/ Act or statutory enactments, rules shall prevail over this Policy.

This policy shall be reviewed from time to time so that the policy remains compliant with applicable legal requirements. The Company Secretary will keep the policy updated as per applicable statutory guidelines.

ANNEXURE - A

DOCUMENTS PRESERVATION SCHEDULE:

The Documents Preservation Schedule is organised as follows:

<u>A.</u>	<u>CORPORATE RECORDS</u>		
	<i>Sr. No.</i>	<i>Record Type</i>	<i>Preservation Period</i>
	1	Certificate of Incorporation/ Registration and change of Name of the Company	Permanent
	2	Common Seal	
	3	Minutes Books of Board, General Meetings and Committees Meetings	
	4	Statutory Registers under applicable law	
	5	Audited Financial Statements	
	6	Quarterly and Annual Financial Results	
	7	License and Permissions & Statutory Approvals	
	8	Statutory Forms except for routine compliance	
	9	Scrutinizers Reports	
	10	Register of Members	
	11	Index of Members	
	12	Annual Returns	8 Years
	13	Attendance Register	
	14	Approvals/ Permissions issued by Stock Exchanges.	
	15	Quarterly/ Half yearly/Yearly Compliance Certificates/ Reports, Intimations of meetings, Disclosures, filed to the Stock Exchanges under relevant statutory law, rules, regulations etc.	
	16	Office copies of Notice of Board & General Meeting and related papers	5 Years
	17	Board Agenda and supporting documents.	
	Other Documents		
	18	Register of Debenture-holders, if any	15 years
	19	Index of debenture-holders, if any	
<u>B.</u>	<u>ACCOUNTS & FINANCE</u>		
	<i>Sr. No.</i>	<i>Record Type</i>	<i>Preservation Period</i>
	1	Annual Audit Reports and Financial Statements	Permanent
	2	Annual Plans and Budgets	8 Years
	3	Books of Accounts, Ledgers and Vouchers	
	4	Bank Statements	
	5	Investment Records	
	Other Documents		
	6	General Correspondence	3 Years

<u>C.</u>	<u>TAX RECORDS</u>		
	<i>Sr. No.</i>	<i>Record Type</i>	<i>Preservation Period</i>
	1	Tax Exemption and Related documents	Permanent
	2	Tax Bills, receipts and payments	
	3	Excise & VAT/Sales Tax Records	
	4	Tax Deducted at Source Records	8 Years
	5	Income Tax papers	
	6	Service Tax papers	
<u>D.</u>	<u>LEGAL FILES AND RECORDS</u>		
	<i>Sr. No.</i>	<i>Record Type</i>	<i>Preservation Period</i>
	1	Court Orders	Permanent
	2	Legal Files	
	3	Licenses (All Renewed and Old)	
	4	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 Years
	Other Documents		
	5	Legal Memoranda and Opinions including subject matter files	3 Years
	6	Litigation files	
<u>E.</u>	<u>PROPERTY RECORDS</u>		
	<i>Sr. No.</i>	<i>Record Type</i>	<i>Preservation Period</i>
	1	Original Purchase and Sale Agreement	Permanent
	2	Property Card, Index II, Ownership records issued by Government Authority	
	3	Property Insurance	
	4	Property Records	
<u>F.</u>	<u>PROJECT</u>		
	<i>Sr. No.</i>	<i>Record Type</i>	<i>Preservation Period</i>
	1	Project Documents and Related correspondence (including any proposal of the Project and its approval)	Permanent

<u>G.</u>	<u>CORRESPONDENCE AND INTERNAL MEMO</u>		
	Sr. No.	Record Type	Preservation Period
	1	Those pertaining to non-routine matters or having significant lasting consequences	Permanent
	Other Documents		
	2	<p>Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g.</p> <ul style="list-style-type: none"> • Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings; • Letters of general enquiry and replies that complete cycle of correspondence; • Letter of compliant requesting specific actions that have no further value after change of name or address; • Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary. 	3 Years
<u>H.</u>	<u>Insurance Records</u>		
	Sr. No.	Record Type	Retention Period
	1	Insurance Policies	8 Years
	2	Journal Entry support data	
	3	Inspections Reports	
	Other Documents		
	4	Claims records	Till settlement is over and claim money is received
	5	Group Insurance Plans	Until plan is amended or terminated

I.	<u>Personnel Records</u>		
	Sr. No.	Record Type	Retention Period
	1	Bonus, Gratuity and other Statutory Records (PF, ESIC etc.)	Permanent
	2	Personal File Record	
	3	Time office Records and Leave Cards	8 Years
	4	Unclaimed Wages Records	
	5	Employees Information Records	
	6	Appointment Letters	
	7	Payroll Registers	
	Other Documents		
	8	Employees Medical Record	3 Years
	9	Leave Card, OD	End of the Job
I.	<u>Electronic Records</u>		
	Sr. No.	Record Type	
	1	Electronic Mail <ul style="list-style-type: none"> • All e-mails received from Internal and External Sources may be deleted after 8 years. • Employees will strive to keep their e-mails related to business issues. • All Emails related to business issues should be downloaded on user system and copy of the same will be available on server. • Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources. • All e-mails of Employees which are important should be copied on the backup device. 	
	2	Web Page Files : Internet cookies All workstations Internet Explorer should be scheduled to delete Internet cookies once per month. 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. Each month the Company will run backup copy of all Electronic files including email on servers. This backup is safeguard to retrieve lost information within 1 year retrieval period. The backup copy is considered a safeguard for the Record retention system of the Company. In certain cases document will be maintained both paper and electronic form.	

ANNEXURE -B

DOCUMENTS DESTRUCTION SCHEDULE:

Sr. No.	Particulars of documents destroyed	Date of destruction of document	Mode of Destruction of document	Signature - Initial (Company Secretary or person authorised)