

LS Industries Limited

Policy for Preservation of Documents

1 OBJECTIVE

In terms of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (*the "Regulations"*) the Board of Directors (*the "Board"*) of LS Industries Limited (*the "Company"*) has adopted this policy, to establish the framework for preservation of documents by classifying them in following categories:

- a) documents whose preservation shall be permanent in nature;
- b) documents with preservation period of eight years after completion of relevant transactions.
- c) documents with preservation period of six years after completion of relevant transactions.

Provided that the Company may keep documents specified in clauses (a) (b) & (c) in electronic mode.

2 APPLICABILITY

This Policy is effective from 1st December, 2015.

3 ROLES & RESPONSIBILITIES

The respective Department Heads of the Company shall be responsible for maintenance and 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 preserved documents must be accessible at all reasonable times. Access may be controlled by concerned Department Head with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

4 PROVISIONS WITH REGARD TO PRESERVATION OF DOCUMENTS

The Company from time to time establishes retention of documents for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as IS/ISO norms. Several categories of records/documents that bear special consideration are identified below by suggesting minimum retention/preservation period. Although the preservation of records which are not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention as identified above, as well as any other pertinent factors, for the time being in force:-

A) Books of Accounts

Books of accounts relating to a period together with vouchers relevant to accounting transactions, invoices and other supporting documents & Audited Financial Statements. These records should be kept for a period of eight financial years.

B) Taxation Records

Taxation records includes, but may not be limited to documents & records concerning correspondences pertaining to an Assessment Year including returns, orders, statements, papers, vouchers, books and other connected information's. These records should be kept for a period of six years after the completion of assessment.

C) Secretarial Records

i) All those documents/records whose preservation is prescribed permanent under Companies Act 2013 & rules/regulations made thereunder as well as under Secretarial Standards should be kept for permanent period.

ii) The documents whose preservation is prescribed for eight years under Companies Act 2013 & rules regulations made thereunder as well as under Secretarial Standards should be kept for eight years after completion of relevant transactions.

D) Stock Exchange related Records

All Stock Exchange and SEBI related records, returns, disclosures, correspondences etc, should be kept for a period of eight years.

E) Legal Case Files & Records

i) All the legal case files, connected documents/records should generally be maintained for a period of three years from the date of completion/disposal of case.

ii) Final Court Orders should be preserved for permanent period.

F) Personnel Records

The personnel records comprising of registers, returns, information's and documents etc. prepared in accordance with applicable Labour laws/Regulations should be kept for a period of three years from the end of financial year to which record pertains. Although, if any Central & State Statute require the Company to keep certain Personnel Records for longer period, then the said longer period shall be followed by the Company in compliance of said Statute.

G) Insurance Records

The insurance records comprising of different policies/plans, claims, settlements, related information's/documents should be kept for a period of three years from the end of financial year to which record pertains.

H) Excise and Custom Records

The excise and custom records comprising of different registers, returns, undertakings, statements, related information's/documents should be kept for a period of five years from the end of financial year to which record pertains.

I) Certain Statutory Approvals/Permissions and Licenses

i) All the Statutory Approvals, Permissions/authorizations, NOC's, Consent orders, Registration Certificates, Exemption Certificates, Key Licenses, issued by different Government Authorities/Statutory Departments, Regulatory Bodies, should be kept for a period of eight years from the date of issuance.

ii) Material Agreements/Contracts executed by the Company with different Government Authorities/Statutory Departments, Regulatory Bodies should be kept as per Law. Although those material Agreements/Contracts, which are executed by the Company with different Government

Authorities/Statutory Departments, Regulatory Bodies and in which any term/tenure is mentioned then upto three years after the completion of said term/tenure.

iii) Original Sale/Purchase Deeds/Agreements, Title Deeds, Ownership Records and connected documents relating to Immovable Properties, should be preserved up to that period the said properties remain in possession of Company. In case of sale, transfer, disposed off etc. of Immovable Properties, the relevant records should be kept for a period of three years from the date of corresponding effect.

J) Departments covered under IS/ISO Certifications

All the departments of Company which are covered under IS/ISO rules/regulations shall maintain and retain their respective records/documents as per IS/ISO obligations, for the time being in force.

5 DESTRUCTION OF DOCUMENTS

After the expiry of Statutory retention period, the preserved documents may be destroyed after the approval of Company Secretarial Department. 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. The Company shall maintain a Register wherein it shall enter brief particulars of the documents destroyed and all entries made therein shall be authenticated by the concerned Department Head for the purpose. The format is annexed herewith.

6 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. Further if the Company desire to preserve any of aforesaid document for a longer period other than that as mentioned above, then it may keep the same.

7 MONITORING & REVIEW

The Board of Directors may review and/or amend this policy either in whole or in part, at any time consistent with requirements of applicable laws, rules and regulations.

FORMAT OF REGISTER OF DOCUMENTS DESTROYED

S. No.	Name of Department	Name of Document	No. of pages	Date & Mode of Destruction	Signature of concerned HOD	Signature of compliance officer