

**CANDOR KOLKATA ONE HI-TECH STRUCTURES PRIVATE
LIMITED**

POLICY FOR PRESERVATION OF DOCUMENTS

PURPOSE OF POLICY

As per the Regulation 9 of Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015 [herein after referred to as “SEBI (LODR) Regulations” or “Regulations”, every listed company is required to have a policy for preservation of documents/ records either in Physical Mode or Electronic Mode.

Since the records of the Company are the important assets of the Company therefore, the Company endeavours to access and manage its records effectively, and is obliged to preserve the records as per this Policy.

DEFINITIONS

- i. **“Company”** means Candor Kolkata One Hi-Tech Structures Private Limited (“K1”)
- ii. **“Board”** means the Board of Directors of the Company or its Committee;
- iii. **“Documents”** means as defined in sub- section 36 of section 2 of the Companies Act, 2013
- iv. **“Electronic Records”** means as defined in Information Technology Act, 2000 or as amended from time
- v. **“Electronic Form”** means as defined in Information Technology Act, 2000 or as amended from time
- vi. **“Listing Regulations”** means the Securities and Exchange Board of India, (Listing Obligations and Disclosure Requirements) Regulations, 2015
- vii. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed
- viii. **“Policy”** means this Policy for Preservation of Documents of the Company;
- ix. **“Records”** in relation to this policy includes accounting records, books or papers and books and papers as defined in sub-section 12 of section 2, books of accounts as defined in sub-section 13 of section 2 of the Companies Act, 2013, statutory and other documents of material significance whether covered under this Policy or not.

Any other term not defined herein shall have the same meaning as ascribed to it under the Companies Act, 2013, Listing Regulations or any other relevant regulation/legislation applicable to the Company.

OBJECTIVE OF POLICY

This Policy provides the comprehensive framework for preservation of documents for a specified period of time to achieve the following objectives:

- a) Effective corporate governance and risk management;
- b) Effective information management to support the work of the administrations and provision of continued access to it at times when needed;
- c) Identification of the Company’s records that are of continuing administrative and historical value to warrant their transfer to and preservation in the Company’s archives.

APPLICABILITY

This policy is applicable to all documents maintained physically and in electronic mode by the Company.

The Documents that are not covered under this policy shall be preserved and maintained in accordance with provisions of the respective Acts/ Rules/ Regulations/ Guidelines/ Notifications as applicable under which those documents are maintained.

SCOPE OF THE POLICY

For the purpose of achieving the above objectives, the documents covered as per this Policy have been divided into two sections, i.e. the records or the documents that will be preserved permanently by the Company and the records or the documents that will be preserved for the period of at least 8 years. This Policy applies to the records maintained by the Company in any format or medium.

AUTHORITY AND RESPONSIBILITY

Any officer as designated by the functional head of the Company in this behalf, shall be responsible for the preservation of the records according to the time frame prescribed in the Policy for their preservation.

All staff and management of the Company shall assist in implementing this policy as appropriate to their roles and responsibilities.

CLASSIFICATION OF RECORDS

Based on the requirement and for the purpose of effective management, the period for which the records of the Company shall be maintained have been classified into two categories:

- a. Documents to be preserved permanently
- b. Documents to be preserved for eight years

a. Documents to be preserved permanently

As required under the applicable provisions of the Act / Rules / Regulations, the documents which are required to be preserved on permanent basis shall be maintained and preserved by the Company permanently.

b. Documents to be preserved for eight years

As required under the applicable provisions of the Act / Rules / Regulations, the documents which are required to be preserved for a period of eight years shall be maintained and preserved by the Company accordingly.

ACCESS AND AUTHENTICITY

The preservation of the records of the Company is vital in order to ensure all current and future access to the records. Preservation is also concerned with ensuring the authenticity of records.

The officer designated may prepare a matrix for identifying persons who will be allowed to access different kinds of records maintained & preserved by the Company. Since the records are maintained at different levels and departments in the Company, therefore functional heads should be authorized to ensure the preservation and access to the Records under their jurisdiction.

RECORD APPRAISAL

The Company shall at regular intervals carry out the appraisal of the records preserved as per this Policy. The purpose of the appraisal process is to ensure the records are examined at the appropriate time to determine whether or not they are worthy of archival preservation, whether they need to be retained for a longer period as they are still in use, or whether they should be destroyed. The appraisal of records shall be undertaken only after the approval of the Board of the Company.

REVIEW OF THE POLICY

This Policy may be amended with the approval of Directors of the Company as may be deemed necessary.

Notes:

- i) Policy for Preservation of Documents made effective from January 9, 2019.
- ii) This Policy is approved by the Board of Directors at their meeting held on May, 2, 2019.
