



Sagarsoft (India) Limited
Document Retention Policy

Policy on Preservation of Documents by Sagarsoft (India) Limited and archival of documents in its website

1. Purpose and Scope

The purpose of this document is to present a policy statement for Sagarsoft (India) Limited (SSIL) regarding preservation of its documents in accordance with the provisions of the Companies Act, 2013 read with Rule 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR”) regarding preservation of documents.

The policy is intended to provide a framework for preservation of documents and to provide guidance to the executives and staff working in SSIL 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 SSIL to retain and preserve its documents as the basis for communication with all its 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 they 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.

This policy has been adopted and approved by the Board of Directors at its meeting held on January 18, 2021.

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.

3. Classification of Documents to be preserved / retained

The Board of Directors have classified the documents to be retained and preserved for posterity in the following categories:

- ❖ Documents that need to be preserved / retained permanently – Doc 1.
- ❖ Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR – Doc 2.
- ❖ Documents to be preserved electronically and archived when necessary – Doc 3.
- ❖ Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case – Doc 4.
- ❖ Emails of all employees in the grade of Manager and above for a period of 5 years – Doc 5.
- ❖ Documents like budget papers etc., which may be retained for less than 8 years – Doc 6.

4. Principle of Responsibility of Employees for Preservation of Documents

All the Employees on 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. Such policy bestowing responsibility on the Company's employees would immensely help company's litigation preparedness helping its law officers and Outside legal counsels to track down documents to handle the legal cases concerned.

5. Periodical Review of the Policy by Top Management

The Policy is flexible and easy to understand to enable employees at all levels to comply with it. The policy will be reviewed periodically by the Head of the Department concerned (HoD) and, if and when practical difficulties are encountered, amendments may be made thereto subject to approval of the Board. The HoD 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. Suspension of Record Disposal in the event of Litigation or Claims

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning SSIL or commencement of any litigation against the Company, such employee shall inform the HoD and any further disposal of documents shall be suspended until such time as the HoD with the due advice from the legal counsel determines otherwise. The HoD in such case shall inform all the employee by mail about the need to retain these documents and for suspension of disposal of the same.

8. This policy was approved by the Board of Directors at its meeting held January 18, 2021.

APPENDIX

(Wherever the retention period indicated is less than the statutory period for which the records concerned are required to be maintained, the statutory period will prevail over the retention period indicated in this policy.)

Type of Record

1. Accounting and Finance records including Annual Financial statement
2. Insurance Records
3. Tax related records
4. Contracts entered into by the Company including Marketing / Sales related 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 retirement related Records
10. Personnel and HR Records
11. Service Records
12. Corporate Social Responsibility Records
13. Correspondence and Internal Memoranda
14. Electronic Documents including email retention and back up
15. Miscellaneous Records

1. Accounting and Finance records including Annual Financial statement

Record Type	Retention Period *	Document Type
Accounts Payable ledgers and schedules	8 Years	Doc - 2
Accounts Receivable ledgers and schedules	8 Years	Doc - 2
Annual Audit Reports and Financial Statements	Permanent	Doc - 1
Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit	Doc - 2
Annual Plans and Budgets	3 years after the budget year is closed	Doc - 6
Bank Statement and Cancelled Cheques	8 years	Doc - 2
Employee Expense Reports	8 years	Doc - 2
General Ledger	Permanent	Doc - 1
Interim Financial Statements	8 years	Doc - 2
Receivable ledgers and schedules	8 years	Doc - 2
Investment Records	Permanent	Doc - 1
Security deposit receipt copies	3 years after termination of the contract	Doc - 6

2. Insurance Records

Record Type	Retention Period*	Document Type
Claim Files (Including correspondence, medical records, injury documentation, etc.)	Permanent	Doc -1
Group Insurance Plans – Active Employees	8 years	Doc - 2
Group Insurance Plans - Retirees	Permanent	Doc - 1
Insurance Policies for the Company	Permanent	Doc - 1
Releases and Settlements	Permanent	Doc - 1

3. Tax records

Record Type	Retention Period *	Document Type
Tax-Exemption Documents and related correspondence	Permanent	Doc -1
Excise Tax records	Permanent	Doc - 1
Payroll Tax records	8 years	Doc - 2
Tax Bills, Receipts, Statements	8 years	Doc - 2
Tax Returns	Permanent	Doc - 1
Tax work paper packages - Originals	8 years	Doc - 2
Sales Tax Records	8 years	Doc - 2
Annual Information Returns – State and Central	Permanent	Doc - 1
Service Tax Records	8 years	Doc - 1

Responsibility: FINANCE AND ADMINISTRATION DEPARTMENT

4. Contracts entered into by the Company including Marketing Records

Record Type	Retention Period *	Document Type
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents)	8 years	Doc - 2

Responsibility: ADMINISTRATION AND MARKETING DEPARTMENT

5. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities.

Record Type	Retention Period	Document Type
Corporate Records (certificate of incorporation, commencement of business, listing agreement, common seal, minutes book of meetings of shareholders, board and its sub-committees, annual reports originals, etc.)	Permanent	Doc - 1
ROC Filings and Stock Exchange filings in physical and Electronic form	5 years from the date of filing	Doc - 6

Responsibility: SECRETARIAL DEPARTMENT

6. Legal Files and Records

Record Type	Retention Period	Document Type
Legal Memoranda and Opinions	3 years after the closure of the matter	Doc - 4
Litigation files	1 year after expiration of disposal of the case	Doc - 4
Licence and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanent	Doc - 1
Court Orders	Permanent	Doc - 1

Responsibility: ADMINISTRATION DEPARTMENT

7. Property Records

Record Type	Retention Period	Document Type
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent	Doc - 1
Original Purchase / Sale Deeds	Permanent	Doc - 1
Original Lease Agreements	3 years after expiration of the lease	Doc - 6

Responsibility: ADMINISTRATION DEPARTMENT

8. Payroll Records

Record Type	Retention Period	Document Type
Employee Deduction Authorization	3 years after termination of service of employment	Doc - 6
Payroll Deductions	3 years after termination of service of employment	Doc - 6
Details regarding gratuity and retirement disbursements	3 years after termination of service of employment	Doc - 6
Payroll Registers (Gross and Net)	3 years after termination of service of employment	Doc - 6
Time Cards / Sheets (where applicable)	2 years	Doc - 6
Unclaimed Wage Records	3 years	Doc - 6
Leave Records	2 years after the relevant period	Doc - 6

Responsibility: HUMAN RESOURCES/ ADMINISTRATION / FINANCE /DEPARTMENT

9. Pension and retirement related Records

Record Type	Retention Period	Document Type
Retirement Records	Permanent	Doc - 1

Responsibility: ADMINISTRATION / HUMAN RESOURCES DEPARTMENT

10. Personnel and HR Records

Record Type	Retention Period *	Document Type
Personnel Files of individual employees	Permanent	Doc - 1
/ Bonuses / Incentives / Awards	8 years	Doc - 2
Employee Earnings Records	3 years after termination of service of employment	Doc - 6
Employee Induction Records	Permanent	Doc - 1
Employee Medical Records	3 years after termination of service of employment	Doc - 6
Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers, employee wise.	3 years after termination of service of employment	Doc - 6
Employment Contracts - Individual	3 years after termination of service of employment	Doc - 6
Correspondence with Placement Agencies and Advertisements for job openings	3 years	Doc - 6
Job Description	3 years after superseding the earlier document	Doc - 6

Responsibility: HUMAN RESOURCES /ADMINISTRATION DEPARTMENT

11. Sponsorship Projects Records

Record Type	Retention Period *	Document Type
Sponsorship agreements	Permanent	Doc - 1

Responsibility: HUMAN RESOURCES DEPARTMENT

13. Corporate Social Responsibility Records

Record Type	Retention Period *	Document Type
Records on CSR Projects(including amount budgeted, spent and balance if any) projects undertaken and progress thereon	Permanent	Doc - 1

Responsibility: ADMINISTRATION / HUMAN RESOURCES /FINANCE DEPARTMENT

14. Correspondence and Internal Memoranda

General Principle: Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract is in force subject to the following.

1. Those pertaining to routine matters and having no significant, lasting consequences should be discarded within two years.
2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

Responsibility: RESPECTIVE DEPARTMENT

15. Electronic Documents including email retention and back up

- Electronic Mail: 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 HoDs.
- 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 employees' workplace.

Document Type: Doc 5

1. Electronic Documents including PDF files.
 - PDF documents – Can be retained for 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 two years depending on the importance or lack of it.

Document Type: Doc – 3

2. **Web page files**
 - May be retained for a period of 5 years as specified in SEBI (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.