



**3C IT SOLUTIONS & TELECOMS (INDIA) LIMITED**  
**(Formerly known as 3C IT SOLUTIONS & TELECOMS (INDIA) PRIVATE LIMITED)**

**POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS**

**PREAMBLE:**

This Policy has been formulated in accordance with Regulation 9 and 30(8) of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015, as amended, read with the circulars issued by the Securities and Exchange Board of India (Hereinafter called as "The Regulations") every listed Company shall frame a policy on preservation of documents. This policy inter alia provides for preservation of documents where such preservation shall be of permanent nature as also documents with preservation period of not less than eight years after completion of the relevant transactions to which such document relates.

**PURPOSE OF THE POLICY:**

The purpose of this policy is to establish the framework needed for effective management of the documents and set principles for Company's approach to preserve them. In order to efficiently conduct its business, the storage, retrieval and management of documents is critical.

A good document preservation program is fundamental to the Company's commitment to administrative efficiency, transparency and accountability. It enables the Company to take decisions and actions by providing essential evidence in the form of documents.

This policy seeks to ensure that the Company's business is adequately documented that are then managed in accordance with best practice. Preservation of documents is the responsibility of all staff & users of archives of the Company to ensure their continuous and timely availability.

**SCOPE:**

This policy is applicable to all departments of the Company. It ensures that the Company maintains both electronic and physical documents as per various statutory requirements and are subject to the same degree of confidentiality and care.

**DEFINITIONS:**

- a) "Act" means the Companies Act, 2013 including any amendment or modification thereof.
- b) "Board" means Board of Directors of 3C IT Solutions & Telecoms (India) Limited, as constituted from time to time.
- c) "Company" means 3C IT Solutions & Telecoms (India) Limited.
- d) "Document" means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;



- e) "Electronic Record(s)" means the electronic record as defined under clause (t) of subsection (1) of section 2 of the Information Technology Act, 2000.
- f) "Electronic Form" means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- g) "Key Managerial Personnel" mean the officers of the Company as defined in Section 2(51) of the Companies Act, 2013 and rules prescribed there under.
- h) "Policy" means policy on Preservation of Documents.
- i) "Preservation" is maintenance of documents, files and documents in usable form.
- j) "Regulations" mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- k) "Secretarial Standards" means standards issued by the Institute of Company Secretaries of India under section 118 (10) of the Companies Act 2013.
- l) "Stock Exchange or Exchanges" mean Bombay Stock Exchange Limited and National Stock Exchange of India Limited
- m) Any other term not defined herein shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.

#### **MODES OF PRESERVATION:**

The Documents may be preserved in

- Physical form or
- Electronic Form.

#### **CREATION OF DOCUMENTS:**

All employees of the Company are required to create accurate documents regarding their respective matters. The documents should:

- i. facilitate necessary action by employees and their successors at any level at all points of time;
- ii. facilitate proper scrutiny of the conduct of businesses by anyone authorized to undertake such scrutiny;
- iii. Protect the financial, legal and other rights of the organization, its clients and any other people affected by its actions and decisions.

#### **AMENDMENT**



Any change in the Policy shall be approved by the Board. The Board shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in

#### **MAINTAINENCE OF DOCUMENTS:**

- a. Information created in physical form shall be scanned and maintained in electronic form as well. The electronic communication shall be maintained on the Company server in year wise folders;
- b. Information which has been disclosed to stock exchange(s), such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter in accordance with this Policy, as the Board may decide. The Company shall also preserve information as per **Annexure 3**.
- c. Place of preservation of physical Documents:-

The Documents will be preserved at the registered office and/or respective local offices of the Company. Considering the space constraints, the management may decide to keep documents at the place of third-party vendor ensuring the safe custody of such documents.

- d. Individuals having right to access and retrieve information :-

The respective Head of Department of which the documents or information is related or any person authorized by the concerned Head of Department will have right to access and retrieve information.

- e. The Management will verify the archive policy periodically.

#### **TYPE OF DOCUMENTS AND TIME PERIOD FOR PRESERVATION**

The company shall maintain and preserve documents as specified hereunder:

**Category (A):** The documents of permanent nature (listed in **Annexure 1**) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved permanently by the Company.

**Category (B):** The documents of the Company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in **Annexure 2**) 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, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, addition or deletion in the documents shall also be preserved for a term not less than eight years. For the purpose of this policy, documents may include: (i) books and papers; (ii) books of accounts; (iii) documents; (iv) register of company as defined in the Companies Act, 2013.



Further, the Company as it may deem fit and possible maintain above mentioned documents in electronic form to the extent possible from time to time.

**EFFECTIVE DATE**

The policy shall be effective from date of in principal.

**REVIEW**

This Policy shall be subject to review from time to time by the Board as may be deemed necessary and in accordance with any regulatory amendments.



**Annexure 1:**

**Documents whose preservation shall be permanent in nature:**

<b>ItemNo.</b>	<b>Records/ Documents</b>
1.	Certificate of incorporation
2.	Certificate for commencement of business
3.	Memorandum and Articles of Association
4.	Agreements made by the Company with stock exchanges, depositories, etc.
5.	Minute books of general meetings, board and committee meetings as per Companies Act, 2013
6.	Register and index of members, debenture-holders, if any or other security holders, if any
7.	Register of contracts as per Companies Act, 2013
8.	Register of charges as per Companies Act, 2013
9.	Register of inter corporate loans and investments as per the Companies Act, 2013
10.	Register of directors and key managerial personnel and its shareholding
11.	Register of disposal of records
12.	Register of documents executed under common seal of the Company
13.	Registers of investments in securities not held in the name of the Company
14.	Register of transfer/ transmission of shares and issued of duplicate share certificates
15.	Such other records as may be required under any law from time to time



**Annexure 2:**

**Documents with preservation period of not less than eight years after completion of the relevant transactions:**

<b>Item No.</b>	<b>Records/ Documents</b>
1.	Instrument creating charge or modification (from the date of satisfaction of charge) as per Companies Act, 2013
2.	Annual returns as per Companies Act, 2013
3.	Register of deposits as per Companies Act, 2013
4.	Register of allotment (from the date of each allotment) as per Companies Act, 2013
5.	Annual financial statements including annual accounts, directors report, -auditors report
6.	Vouchers / voucher register and books of accounts as defined under sub-section 13 of section 2 of the Companies Act, 2013
7.	Income tax returns filed under Income Tax Act, 1961
8.	All notices in form MBP - 1 received from Directors and KMPs along with any amendment thereto
9.	Return of declaration in respect of beneficial interest in any share as per Companies Act, 2013
10.	Copy of newspaper advertisement or publications
11.	Records relating to court cases / CBI cases / police cases/ civil suits/labor court cases/ arbitration cases.
12.	Compliance reports received from any statutory authority
13.	Correspondences made with any statutory authority
14.	Register of power of attorneys, if any
15.	Forms and returns filed with RBI/MCA or with any other statutory authority



**Annexure 3:**

Sr no	Requirements	Record Type	Period
1	Section 128 (5) of Companies Act, 2013	Books of accounts	Minimum 8 Years
		All sales and purchases of goods/services by the company	
		All sums of money received and expended by the company and the matters in respect of which these have taken place.	
		The assets and liabilities the of company	
		The books of accounts together with the vouchers, invoices and other connected documents or records shall be preserved in good order: Provided that where an investigation has been ordered in respect of the Company under Chapter XIV, the Central Government may direct that the books of account may be kept for such longer period as it may deem fit.	
		Employee's salary, bonus and other remuneration	
2	The Information Technology Act 2000	Audit trails and verification computer records of applications transactions and significant events must be retained for a minimum period of two years or longer depending on specific record retention requirements.	Minimum 2 years
3	Information Security Management System (ISMS)	ORS Information Security Policy	Minimum 2 years
4	Legal proceedings under various Acts, as per Indian Laws, including, but not limited to consumer protection Act, 1986 , Arbitration and Conciliation Act, 1996, Civil Procedure Code 1908, etc.	<p>Preservation of records</p> <p>In the case of complaint, the record containing main files with original order sheet shall be preserved for a period five years.</p> <p>In the case of records of first appeal and revision petitions, it shall be preserved for three years from the date of disposal of the appeal or revision as the case may be.</p>	5 years
5	Information disclosed to Stock Exchanges	The information disclosed to stock exchanges shall be preserved for 8 Years	8 Years