



**Orient Green
Power Company
Limited**

PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY



PRESERVATION OF DOCUMENTS & ARCHIVAL POLICY

PREAMBLE

In terms of Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations), Orient Green Power Company Limited. (the Company) is required to formulate a policy for preservation of documents required to be maintained under the Listing Regulations in at least two categories as specified in the said Regulation.

In terms of Regulation 30(8) of the Listing Regulations, the Company is required to formulate an archival policy for all disclosures of events/information to the Stock Exchanges in terms of the Company's Policy for Disclosure of Events/Information and Determining of Materiality.

OBJECTIVE

The purpose of this policy is to establish the framework needed for effective preservation of documents and records of the Company required to be maintained under the Listing Regulations, in terms of Regulation 9 and also to archive any of the material of events or information which are disclosed by the Company to the Stock Exchanges prior to the period of five years in terms of Regulation 30.

PRESERVATION OF DOCUMENTS:

Preservation of Documents with specific reference to the Companies Act, 2013 and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

- documents whose preservation shall be permanent in nature: As per Annexure 1.
- documents with preservation period of not less than eight years after completion of the relevant transactions: As per Annexure 2.

DISCLOSURE/AMENDMENT

Any change in the Policy shall be approved by the Board of Directors of the Company.



Annexure 1

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

Corporate Records

1. Incorporation Document
2. Memorandum and Articles of Association
3. Register of members along with the index
4. Register of Directors and Key Managerial Personnel
5. Register of Renewed and Duplicate Share Certificates
6. Register and index of Beneficial Owners
7. Register of Shares or other securities that have been bought back
8. Share certificate forms and related books and documents – disputed cases
9. Register of Charges
10. Register of Loans, Guarantees, Security and Acquisition
11. Register of Investments made by the Company not held in its name
12. Register of Transfer and Transmission of Shares
13. Register of Contracts or Arrangements in which Directors are interested
14. Foreign Register of Members
15. Common Seal
16. Registration Certificate
17. Constitutional documents i.e., Memorandum and Articles of Association of the Company
18. Affidavit from the subscribers to the memorandum and from person named as the first directors
19. Minutes of proceedings of general meeting and resolutions passed by postal ballot, meeting of Board of Directors, Creditors, Committees of the Board of Directors and resolutions passed by circulation
20. License and Permissions
21. Statutory Clearances, Annual Returns, Assessment Orders, Loan Documents, Security Documents, Guarantee Documents, Investment Documents, Management Consultancy Agreements, Stock Exchange Listing Permissions etc.
22. Forms and returns filed with the Registrar of Companies, Ministry of Corporate Affairs, SEBI or any other Regulatory Authority.
23. Statutory Forms except for routine compliance
24. Scrutinizers Report
25. Any court/ NCLT orders
26. Certificates issued by the Registrar of Companies.
27. Documents related to purchase of shares/investments in an entity



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28. Books and documents relating to issue of share certificate, including blank forms of share certificates
 29. Other statutory registers and documents maintained by the Company under various laws applicable to the Company or as prescribed by the Board of Directors from time to time.

Accounts and Finance

1. Annual Audit Reports and Financial Statements
2. Subsidiary's Account
3. Internal/Cost audit Reports
4. Compliance/Secretarial Audit Report
5. Policies & amendments

Tax Records

1. Registration Certificates
2. Tax Exemption and Related documents
3. Tax Bills, receipts and payments, returns & records

Legal Files and Records

1. Court Orders
2. Business / JV/SPA/Loan/Lease Agreements
3. Trade Mark /Copy Rights/Patents

Property Records

1. Original Purchase and Sale deeds

Projects

1. Project Documents and Related correspondence (including any proposal of the Project and its approval)
2. The documents containing the terms and conditions regarding operation and management of manufacturing units.



Correspondence and Internal Memo

1. Those pertaining to non-routine matters or having significant lasting consequences

Insurance Records

1. All Insurance Policies

Personnel Records

1. Payroll Registers
2. Bonus, Gratuity and other Statutory Records
3. Files of Employees
4. Training Register
5. Employee Welfare Benefits Records

Agreement

1. Material Agreements/Contracts



Annexure 2

Documents with Preservation period of not less than three years, eight years or more after completion of Relevant Transaction and Miscellaneous

Corporate Records

1. Annual Returns and other Forms filed with MCA
2. Board Agenda and supporting documents
3. Attendance Register
4. Office copies of Notice of General Meeting and related papers
5. Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers
6. All notices pertaining to disclosure of interest of Directors
7. Register of Deposits
8. Instrument creating a charge or modification
9. Postal Ballot Forms
10. Films, Audio, Video, CDs, DVDs, etc
11. Correspondence with Department/Shareholders
12. Certificates surrendered to a Company
13. Instrument creating a charge or modification
14. Disclosures – SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
15. Disclosures – SEBI (Prohibition of Insider Trading) Regulations, 2015
16. Protected Disclosures in writing or documented along with the results of investigation relating thereto (including the Investigation Report) as reported under the whistle-blower policy
17. Any other documents which have been so decided to be preserved by the Function/ Department Heads, either under their own respective judgments or as required to be preserved by any specific Law
18. Miscellaneous – Register of Debenture-holders, if any (15 years after the redemption of debentures)
19. Miscellaneous – Index of debenture-holders, if any (15 years after the redemption of debentures)
20. Other statutory registers and documents maintained by the Company under various laws applicable to the Company or as prescribed by the Board of Directors from time to time.

Accounts and Finance

1. Annual Plans and Budgets
2. Books of Accounts, Ledgers and Vouchers



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3. Sales Invoice & Purchase Invoice
 4. Bank Statements
 5. Investment Records
 6. RBI Returns
 7. Miscellaneous – General Correspondence (3 Years)

Tax Records

1. Excise/Customs Records/GST
2. Tax Deducted at Source Records
3. Income Tax returns/correspondence
4. Service Tax returns/correspondence
5. VAT / CST / State Sales Tax/GST returns
6. Above records needs to be maintained from 8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.

Legal Files and Records

1. Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)
2. Miscellaneous – Legal Memoranda and Opinions including subject matter files (3 years after the close of the matter)
3. Miscellaneous – Litigation files

Insurance Records

1. GPA Policy (Group Personal Accident Policy)
2. Claims records (Till settlement is over and claim money is received)
3. Group Insurance Plans (Until plan is amended or terminated)

Personnel Records

1. Time office Records and Leave Cards
2. Employee files
3. Management Policies & Procedures
4. Employee welfare Benefits records
5. Training & development records
6. Payroll & performance appraisal records



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7. Exit & Final settlement records
 8. Gratuity claims & records
 9. Employees Information Records
 10. Statutory Returns /Reports

Correspondence and Internal Memo:

Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g.

- 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 the cycle of correspondence; (3 Years)

Electronic Records:

1. Electronic Mail:

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 to a server or user directory 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 to the employees' folder.

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 a safeguard to retrieve lost information within 1 (one) year retrieval period should the documents on network experience problems. The backup copy is considered a safeguard for the record retention system of the Company.

Policy Framed: November 05, 2015