

THIRU AROORAN SUGARS LIMITED

POLICY ON PRESERVATION OF DOCUMENTS AND ARCHIVAL OF DOCUMENTS IN THE WEBSITE

[Under Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

1. PREAMBLE:

Documents and Records and archives form an essential and significant part of Company's resources. Records are a basic tool of administration. They are the means by which operational processes and functions are performed.

SCOPE AND OBJECTIVE:

Securities and Exchange Board of India has, vide its Notification dated September 2, 2015, introduced the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, which will come into effect from December 1, 2015. Pursuant to Regulation 9 of the aforesaid SEBI Regulations, the companies are required to have a policy for preservation of documents as approved by its Board of Directors. Further, Regulation 30 (8) requires the Companies to frame a Policy of Archival of the information disclosed on its website.

In compliance of the aforesaid Regulations, the Board of Directors in their Meeting held on November 11, 2015, have approved the Policy on preservation of documents and archival of documents and the Policy would become effective from December 01, 2015.

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 contains guidelines on how to identify documents that need to be maintained, how long certain documents 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. The Policy further encompasses the manner of archival of the documents which have been disclosed on the website of the Company for the time frame prescribed under Regulation 30 (8).



DEFINITIONS:

A. "Board of Directors" or "Board"

Board of Directors or Board shall mean the Board of Directors of Thiru Arooran Sugars Limited as constituted from time to time.

B. "Company"

Company shall mean "Thiru Arooran Sugars Limited"

C. "Applicable Laws"

Applicable Laws means any law, statutory rules and regulations, or standards applicable to the Company including the Companies Act, 2013, Income Tax Act, 1961, Securities and Exchange Board of India Act, 1992 and SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 under which any guideline/provision with regard to the preservation of the documents has been prescribed.

D. "Regulations"

Regulations shall mean Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 also called as "Listing Regulations".

E. "Policy"

Policy means Policy for preservation of documents and archival of documents in the website

F. "Documents"

Document(s) refers to notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, registers and or any other records required under or in order to comply with the requirements of any Applicable Law, maintained on paper or in electronic form.

G. "Electronic Form"

Electronic Form means maintenance of documents in any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, hard 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.



H. "Maintenance"

Maintenance means keeping documents, either physically or in electronic form.

I. "Preservation"

Preservation means to keep in good order and to prevent from being altered, damaged or destroyed.

J. "Archive/archiving"

Archive/archiving is the process of transferring records to a repository managed by personnel specialised in storing, conserving and authorizing access to the records entrusted.

Words and expressions not defined in this Policy shall have the same meaning as defined in SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015, Securities and Exchange Board of India Act 1992, or the Companies Act, 2013 and rules and regulations made there-under.

2. POLICY FOR PRESERVATION OF DOCUMENTS

I. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED:

Based on the duration of preservation, the Company shall classify the documents into following categories:

- A. Documents whose preservation shall be permanent in nature;
- B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions;

The Documents may be preserved either in physical form or on electronic form, at the discretion of the Company.

A. Documents whose preservation shall be permanent in nature:

The following documents shall be maintained and preserved permanently:

- 1. Certificate of Incorporation and other Registration Certificates
- 2. Memorandum and Articles of Association
- 3. Property records including documents of title of immovable properties of the Company and other relevant documents such as Approvals and Licenses.
- 4. Factory Licenses and Statutory Approvals



5. Statutory Registers required to be maintained permanently under applicable laws
6. Accounting and Finance records including Annual Audited Financial Statements and Audit Reports.
7. Tax Records including Statutory Annual Returns filed by the Company under applicable laws
8. Minutes of the General Meetings and the Minutes of the Meetings of Board of Directors, various Committee of Directors and other Committees constituted by the Board.
9. Material Agreements/Contracts
10. Orders issued by Courts/Statutory Bodies
11. Investment Records viz. Documents/proofs including certificates etc.
12. Personal files of individual employees
13. Any other document required to be permanently preserved by the Company under any applicable laws for the time being in force.
14. Any other record as may be decided by the Management of the Company from time to time.

B. Documents whose preservation period shall not be less than eight years after completion of the relevant transactions:

The following documents required as per concerned Act shall be maintained and preserved for a period of not less than eight years after the completion of the relevant transactions:

1. Books of Account as defined under the Companies Act 2013
2. Bank Statements and Vouchers
3. Statutory Registers/ Documents /Returns required to be maintained for 8 (eight) years under the Companies Act, 2013
4. Filings with Stock Exchanges, Registrar of Companies and other statutory authorities.
5. Personnel Documents viz., Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, pension and retirement related records, etc.
6. Insurance Policies/ Claims under various Insurance Policies
7. Any other record as may be decided by the Management of the Company from time to time.



II. MAINTENANCE OF RECORDS:

The Documents may be preserved either in Physical form or on Electronic form, at the discretion of the Company and as may be permitted under the Companies Act, 2013 or any other law for the time being in force. The Company shall endeavour to preserve all the documents enlisted above in accordance with this Policy. The Company shall maintain all records as per the Companies Act, 2013 and SEBI Regulations for not less than 8 (eight) Years. Documents that are to be made available on the Company's website in Compliance with the SEBI (Listing Regulations and Disclosure Obligations) Regulations, 2015 will be made available on the website for a period of 5 years and thereafter will be archived for a period of 3 years.

III. ROLES & RESPONSIBILITIES

The respective Head(s) of Departments of the Company shall be responsible for maintenance, preservation and destroying of documents in respect of the areas of operations falling under the charge of each of them.

All records in physical form are to be maintained by the respective Department(s) at the respective locations. Electronic version(s) of all of records are to be maintained within the Company's centralized electronic record software database, which is maintained by the Systems Department.

The physical documents that are preserved may also be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

IV. DESTRUCTION OF DOCUMENTS

After the expiry of the statutory retention period, the preserved documents may be destroyed in such mode under any instructions approved by the department head(s). A list of the documents destroyed shall also be maintained. It shall state the brief particulars of the documents destroyed, date of destruction. This applies to both physical and electronic documents.



3. ARCHIVAL POLICY:

The purpose of this Archival Policy is to ensure that all documents/records/data which are required to be retained by the Company has been backed up appropriately and to safeguard against the loss of data that may occur due to hardware or software failure, physical disaster or human error. The Policy applies to documents/ information hosted on the website of the Company including events/information required to be disclosed on website under SEBI Regulations.

1. Important original documents shall be kept in a secure location.
2. A record that is no longer required by the Unit, Department, or Division from which it originates or is received, and that has permanent legal, institutional, or historical value, shall be archived.
3. Hard copies or scanned copies of documents beyond its operational date may be kept onsite for reference purposes.
4. Electronic data shall be backed-up by the Systems Department and the back-up files shall be kept at an offsite location.
5. Copies of all material disclosures made to the Stock Exchanges under Regulation 30 of the Listing Regulations shall be hosted on the website of the Company for a minimum period of 5 years. After a period of 5 years from the date of filing the records or documents with the Stock Exchanges, the copies of such records or documents shall be archived from the website of the Company. Any one intending to review the Disclosed Information after 5 (five) years may write to the Compliance Officer of the Company.

4. PERIODICAL REVIEW AND AMENDMENTS TO THE POLICY:

The Chairman and Managing Director of the Company is authorised to periodically review the Policy and give suggestions to the Board of Directors to make such changes as considered necessary. The Board of Directors may subject to the applicable laws, amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace this policy entirely with a new policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

