

POLICY RELATING TO PRESERVATION OF DOCUMENTS

Regulation 9 of SEBI (Listing Obligation & Disclosure Requirements) Regulations, 2015 requires that a listed entity shall have a policy for preservation of documents, approved by its Board of directors, classifying them in at least two categories as follows :-

- a) documents whose preservation shall be permanent in nature;
- b) documents with preservation period of not less than eight years after completion of the relevant transactions.

2 The policy relating to preservation of documents which was approved by the Board in its meeting held on 12th February, 2016, is as under :

i) All units/Divisions of ITDC shall follow the circular issued by the Administration Division from time to time. (Presently the circular is Ref: Admn:Misc:2011 dated 11th March, 2011)(Copy enclosed)

ii) Company Secretary Division shall follow the provisions of the Companies Act, 2013, Rules made there under, SEBI Regulations and Secretarial Standards issued by the Institute of Company Secretaries of India with respect to preservation of documents. With respect to other records not mentioned in the Companies Act, 2013, Rules, SEBI Regulations and Secretarial Standards, Company Secretary Division will follow the circular issued by the Administration Division from time to time.

iii) Following records shall also be kept as permanent documents:

- a) Asset disposal records relating to disinvestment.
- b) Disciplinary proceedings and arbitration cases.

3 Permanent records shall be kept in the form of Microfilm, Hard-disc or any other permanent device as per the government guidelines/circular. Records disposal should be properly recorded as per the government guidelines.
