

Forbes & Company Limited

POLICY FOR PRESERVATION OF DOCUMENTS

1.0 **Legal Framework**

1.1 The Securities and Exchange Board of India (“SEBI”), vide its Notification dated September 2, 2015, has issued the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”). The Listing Regulations are effective from December 1, 2015. Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 specifies that every listed entity shall have a policy for preservation of documents.

2.0 **Objectives of the Policy**

2.1 The documents of the Company are important assets of the Company (“Documents”). Preservation of Documents is an important requirement under various laws. The objective of this Policy is to provide a binding framework for preservation of Documents maintained by the Company under various applicable laws including Listing Regulations.

2.2 The Policy provides that the Company shall maintain Documents permanently or for a specified period of time, as may be required or applicable. A Document may mean and include, but not limited to documents such as data, printed materials, books of accounts, forms, permits, registers, approvals, licenses, memorandums, contracts, minutes of statutory meetings, auditor’s reports, employee records, strategic documents, intellectual property documents, title deeds, court/tribunal orders, tax returns/assessments, etc.

3.0 **Preservation of documents:**

3.1 Period and place of preservation: The documents shall be preserved in the manner as stated below:

Type of Documents	Period of preservation
Documents evidencing registration/incorporation of the Company/change of name etc. and Constitution documents such as Memorandum and Articles of Association.	Permanently
Statutory Registers, Minutes book, Original signed Financial Statements and Annual Return prepared under the Companies Act, 1956/2013.	Permanently
Documents relating to issue/allotment of securities (Prospectus, Letter of Offer, Register of Allotment, etc.).	Permanently
Notices and Agenda of the Board Meeting/Annual General Meeting/Extra Ordinary General Meeting and Attendance Registers of Board/committee meetings, declarations from Directors etc.	For eight financial years.
Court Orders relating to amalgamations/mergers/de-mergers etc. and approval of Central/State Governments.	Permanently
Various filings made with Registrar of Companies, stock exchange(s), Reserve Bank of India or any other statutory authority(ies)	Permanently
Books of Accounts of the Company.	For eight years after completion of the relevant financial year.
Various policies adopted by the Board of Directors.	Permanently
Approvals/Permissions/Consents for carrying out any activity/Business.	Permanently

Contracts entered into by the Company from time to time.	For eight years after the expiry of the term of the contract.
Documents relating to legal cases and litigation relating to the Company.	For eight years after completion of legal proceedings.
Taxation Documents including documents concerning tax assessment, tax filings, tax returns, proof of deductions, Challans, appeals preferred against any claim made by the relevant tax authorities.	For eight years or till completion of assessment whichever is later.
HR Documents including records or Documents relating to recruitment, employment and personnel information, remuneration, entitlements, performance review, action taken by or against any employee, complaints by or against any employee.	Till such time the person is in employment with the Company and thereafter for a period as per HR Policy of the Company.
Legal opinions, Power of attorneys, Authority Letters, orders/judgments/ awards of the court /tribunal /authorities.	Permanently
Documents relating to any property owned by the Company.	Permanently
Intellectual property Rights documents shall include, but not be limited to copyrights, trademarks, patents, and industrial designs. Intellectual property rights documents that are owned by the Company.	Permanently
Licenses obtained by the Company.	Eight (8) years from the date of expiry/ termination of the License.
Any other statutory documents not covered above.	For eight financial years.

3.2 Physical Documents: All physical Documents shall be maintained and safely stored appropriately by the respective departments or in a common storage place, as may be decided by the Company from time to time.

3.3 Electronic Documents: All electronic Documents shall be preserved in accordance with the policy framed by the Information Technology Department of the Company from time to time and in compliance with the applicable laws.

3.4 Disposal of Documents: The destruction and disposal of Documents shall be done in compliance with the applicable laws and the policy of the Company. All the Documents containing information of a confidential or sensitive nature on paper, card, or electronic media must be securely destroyed when they are no longer required.

4.0 Policy Enforcement

4.1 The Policy is effective with immediately effect.

4.2 The employees of the Company shall strictly comply with this Policy. Each Head of the Function /department shall lay down internal process for preservation of Documents pertaining to the respective Function/department in compliance of this Policy.

4.3 If an employee has reasons to believe, or the Company informs the employee concerned, that Company Documents are relevant to litigation or potential litigation (i.e., a dispute that could result in litigation), then the employee must preserve those Documents until the Legal department determines that the Documents are no longer needed. This exception supersedes any previously or subsequently established destruction mechanism for those Documents. If an employee(s) believe that

exception may apply or have any question regarding the possible applicability of that exception, he/she may consult the Head of Legal.

- 4.4 While minimum retention periods are suggested in regard to certain Documents, the retention of the Documents not included in the above schedule shall be determined by the Head of the Function/Department in compliance with any other policy/law that governs those Documents.
- 4.5 The physical documents preserved may be converted, whenever required or felt necessary, into electronic form to ensure ease of maintenance of records and efficient utilization of space. Where a Document is maintained both in physical and electronic form, the authenticity with reference to the physical form should be considered for every purpose.

5.0 General

- 5.1 Where the terms of this Policy differ from any existing or newly enacted law, rule, regulation, the law, rule, regulation will take precedence over this Policy from the effective date of such law, rule or regulation.
- 5.2 For interpretation of this Policy, reference and reliance may be placed upon circulars/clarifications issued by the Ministry of the Corporate Affairs or Securities and Exchange Board of India and/or any other authority.