

PRESERVATION OF DOCUMENTS POLICY



1. Objective of the policy

Tata Technologies Limited (the “**Company**”) is guided by various legal, regulatory and statutory requirements as applicable from time to time, with regard to record keeping, record retention and destruction of records. The Company is required to maintain certain types of corporate records for a specified period of time under applicable corporate/securities laws, including the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 (“**SEBI Listing Regulations**”) and the Companies Act, 2013. The objective of this Preservation of Documents Policy (the “**Policy**”) is to have a binding framework for the preservation of documents of the Company. The purpose of this Policy is to formulate a policy for preservation of documents in accordance with the SEBI Listing Regulations so as to provide a framework for their adequate protection and preservation as per applicable laws.

2. Policy

The corporate documents of the Company are important assets. A corporate document may be in the form of an agreement, memorandum, e-mail, contract or case study and includes calendars, appointment books, expense records, etc.

The law requires the Company to maintain certain types of corporate records either permanently or for a specified period of time. Failure to retain the records could subject the employees and the Company to penalties and fines, cause the loss of rights, obstruct justice, adversely impact potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation.

The Company expects all employees to fully comply with this Policy, provided that if an employee has reasons to believe, or the Company informs the employee concerned, that Company records are relevant to litigation, or potential litigation, then the employee must preserve those records until the Legal Team determines that the records are no longer needed.

3. Documents to be Preserved

This Policy shall have a preservation of documents in physical or electronic form in two categories:

- (a) Documents which need to be preserved permanently by the Company subject to the modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved permanently by the Company.
- (b) Documents with a preservation period of not less than the time period stipulated in the SEBI Listing Regulations and other laws and statutes applicable to the Company from time to time after completion of the relevant transactions subject to the

modifications, amendments, additions, deletions or any changes made therein from time to time. Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for the said period. This is currently eight (8) years.

S. No	Nature of Document(s)	Preservation Period	Department (Responsibility)
1.	Registration Certificates/ Certificate of Incorporation/ Change of name etc. (as amended from time to time) as issued by Registrar of Companies.	Permanent	CoSec
2.	Memorandum and Articles of Association (as amended from time to time).	Permanent	CoSec
3.	Minutes of General Meeting/ Board Meeting/ various Committee Meetings	Permanent	CoSec
4.	Court Orders relating to amalgamations/ mergers/ de-mergers etc.	Permanent	CoSec and Legal
5.	Books of Accounts of the Company	For eight years after completion of the relevant financial year.	Finance
6.	Annual Return of the Company	For eight years from the date of filing	Finance and CoSec
7.	Taxation documents including tax filings/ tax returns.	For eight years from the end of relevant assessment year or till completion of assessment whichever is later.	Finance
8.	Property documents	Perpetual or for a period of 8 (Eight) Years after the rights in such property ceases to exist	Facilities/Administration
9.	Judgements/Orders/Interim Orders/Pleadings	Orders passed by any Court or Tribunal or any	Legal

		Authority or Judgment which are final in nature and cannot be superseded shall be retained permanently. Interim Orders shall be retained till a Final Order is received or for a period of 8 (Eight) Years whichever is higher. Pleadings shall be retained for a period of 8 (Eight) Years or till the matter has been disposed off, whichever is higher.	
10.	Approvals/ Permissions/ Consents for carrying out any activity/ business.	To be maintained till the validity of such approval.	CoSec
11.	Marketing/Sales documents/Press Releases	8 years	Marketing
12.	Shareholders Agreements/ Joint Venture Contracts	To be maintained till the time these Agreements / Contracts are in force.	CoSec
13.	Any other documents as per the Companies Act, 2013 or the SEBI regulations.	Eight (8) years	CoSec
14.	Employee Records	8 years post separation of employment	HR and Payroll

4. Modes of Preservation

- The documents may be preserved either in physical form or electronic form.
- The officer(s) of the Company who is / are generally expected to observe the compliance of requirements of applicable law shall be the person(s) of the department responsible to preserve the documents (authorized person).

- The preservation of documents should be in such a manner to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the documents.
- The preserved documents must be accessible at all reasonable times. Access may be controlled by the authorized person for preservation, so as to ensure integrity and confidentiality of the documents and prohibit unauthorised access.
- The Company shall make appropriate provisions for back up of all documents preserved both physically and electronically.

5. Disposal/Destruction of Documents

Post the required time-frame for preservation of the documents, the respective departments are required to destroy the records. Physical records disposed of pursuant to the retention periods specified above shall be disposed of using a cross-cut shredder. Electronic records shall be subject to secure electronic deletion. The details of documents destroyed by the Company shall be recorded in the register of disposal of records to be kept by authorized persons who are disposing of the documents. This applies to both physical and electronic documents.

6. Effective Date

The Policy as approved by the board of directors of the Company ("**Board**") shall be effective from _____.

7. General

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.

This Policy has been adopted by the Board and the Board may review and amend the Policy, as and when required to do so due to regulatory changes or under any other circumstances necessitating revision to the Policy.

All employees of the Company are required to comply with the provisions of this Policy. Failure to comply with this Policy by any company personnel may result in disciplinary action. Any queries regarding this Policy may be referred to the responsible person, who is in charge of administering, enforcing and updating this Policy.

For more information about
Tata Technologies and what we
can do to help create better
products for your customers,
visit: www.tatatechnologies.com

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