



*POLICY ON PRESERVATION OF DOCUMENTS/ ARCHIVAL
POLICY ON WEBSITE DISCLOSURE*

1. Preface

The Board of Directors (the “Board”) of Bharat Gears Limited (the “Company”) has approved the following Policy (“The Policy”) of the Company for preservation of Documents /Records maintained by the Company either in Physical Mode or Electronic Mode including those which are disclosed on the website of the Company (hereinafter referred to as “the Documents”). This Policy has been formulated in accordance with the Regulation 9 and Regulation 30(8) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations).

2. Purpose of the Policy

The purpose of this Policy is to ensure that the all the necessary documents and records of the Company are adequately protected and preserved as per the statutory requirements and to ensure that the records of the Company which are no longer needed or are of no value are discarded after following the due process for discarding the same. This Policy is also for the purpose of aiding employees of the Company in understanding their obligations in retaining and preserving the documents and records which are required to be maintained as per the applicable statutory and regulatory requirements.

3. Administration

Attached as **Appendix A** is a Documents Preservation Schedule that is approved as the Initial Schedule for maintenance, preservation and disposal of the Documents. The Company may preserve the Documents in electronic mode. The Compliance Officer of the Company, (the Administrator) shall be in-charge of administration of this Policy and the implementation process and procedures to ensure that Documents Preservation Schedule is followed. The Administrator is also authorised to make modifications to the Documents Preservation Schedule from time to time to ensure that it is in compliance with local, State and Central Laws and monitor compliance with this Policy.

4. Destruction of Records

Records which no longer serve a useful purpose should be destroyed. This would free filing equipment for storage of records currently needed in the conduct of business. Records destruction can also improve operational efficiency by reducing the quantity of records to be searched in order to locate the needed information.



However, it be noted that all confidential records shall be destructed only after the approval of the Directors of the Company or the Company Secretary.

The modes of destruction of records shall include (but not limited to) the following:

- a. Confidential paper records- shall be destroyed by making them unreadable.
- b. Non-confidential paper records- shall be sold to waste-paper dealers or recycled.
- c. Electronically stored records- shall be erased or destroyed with the help of the Computer Department.
- d. Destruction of magnetic media records such as floppy disks- shall be destroyed by reformatting the same at least once.
- e. Destruction of optical media records such as rewritable disks- shall be destroyed by cutting, crushing or other physical means.

5. Manner of Public Disclosure of records published on the Website of the Company

The documents required to be published on the website of the Company shall be hosted under the “Investors” section of the website till 5 (Five) years from its disclosure on the website of the Company i.e. www.bharatgears.com.

Thereafter, the same shall be transferred to the “Past Information/Events” section till such time as may be instructed by the Directors of the Company or the Company Secretary. However, in case of any updation in disclosure of such published record, the older record can be removed from the website of the Company as per the will of the Directors of the Company or the Company Secretary, provided it does not lead to contravention of any law(s) or regulation(s) in force.

6. Communication of this Policy

This Policy shall be posted on the website of the Company i.e. www.bharatgears.com and also on the intranet website of the Company.

7. Role and Responsibility of various Departmental heads

- a. The Departmental heads must be familiar with this policy and educate their Department in this regard.
- b. They must restrict access to confidential records and information.
- c. They must coordinate in the destruction of the records when required.



8. Amendment

Any change in the Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

APPENDIX “A” – DOCUMENTS PRESERVATION SCHEDULE

The Documents Preservation Schedule is organised as follows:

Section Topic

- A. Corporate Records
- B. Accounts and Finance
- C. Tax Records
- D. Legal Files and papers
- E. Property Records
- F. Projects Records
- G. Correspondence and Internal Memo
- H. Insurance Records
- I. Personnel Records
- J. Electronic Records

A: Corporate Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Common Seal	Permanent
2.	Minutes Books of Board, General Meetings and Committees Meetings	Permanent
3.	Statutory Registers	Permanent
4.	License and Permissions	Permanent
5.	Statutory Forms except for routine compliance	Permanent
6.	Scrutinizers Reports	Permanent
7.	Register of Members	Permanent
8.	Index of Members	Permanent



Documents to be retained for a minimum period of 8 years		
9.	Annual Returns	8 years from the filing with the Ministry of Corporate Affairs
10.	Board Agenda and supporting documents	8 years
11.	Attendance Register	8 Years
12.	Office copies of Notice of General Meeting and related papers	8 Years
13.	Office copies of Notice of Board Meeting/ Committee Meeting, Agenda, Notes on Agenda and other related papers	8 Years
Miscellaneous		
14.	Register of Debenture-holders, if any	15 years after the redemption of debentures
15.	Index of debenture-holders, if any	15 years after the redemption of debentures

B: Accounts and Finance		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Annual Audit Reports and Financial Statements	Permanent
Documents to be retained for a minimum period of 8 years		
2.	Annual Plans and Budgets	8 years after completion of Audit
3.	Books of Accounts, Ledgers and Vouchers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
4.	Investment Records	8 Years
Miscellaneous		
5.	General Correspondence	3 years



C: Tax Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Tax Exemption and Related documents	Permanent
Documents to be retained for a minimum period of 8 years		
2.	Income Tax papers	8 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
Miscellaneous		
3.	Income Tax papers related to Foreign Assets	16 years from the end of Financial Year or completion of assessment under Income Tax whichever is later
4.	Excise Records	5 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later
5.	Service Tax papers	5 years from the end of Financial Year or completion of assessment under Service Tax whichever is later

D: Legal Files and Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Court Orders	Permanent
Documents to be retained for a minimum period of 8 years		
2.	Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)	8 years after termination or expiration of contracts



Miscellaneous		
3.	Legal Memoranda and Opinions including subject matter files	3 years after the close of matter
4.	Litigation files	3 year after close of the Litigations

E: Property Records		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Original Purchase and Sale Agreement	Permanent
2.	Property Card, Index II, Ownership records issued by Government Authority	Permanent
Miscellaneous		
3.	Property Insurance	3 years

F: Project		
Sr. No.	Record Type	Preservation period
Miscellaneous		
1.	Project Documents and Related correspondence (including any proposal of the Project and its approval)	3 years

G: Correspondence and Internal Memo		
Sr. No.	Record Type	Preservation period
Documents to be retained permanently		
1.	Those pertaining to non-routine matters or having significant lasting consequences	Permanent



Miscellaneous		
2.	<p>Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g.</p> <ul style="list-style-type: none"> • 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 cycle of correspondence; • Letter of compliant requesting specific actions that have no further value after change of name or address; • Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary. 	3 years

H: Insurance Records		
Sr. No.	Record Type	Preservation period
Miscellaneous		
1.	Insurance Policies	3 years
2.	Claims records	Till settlement is over and claim money is received
3.	Group Insurance Plans	Until plan is amended or terminated
I: Personnel Records		
Sr. No.	Record Type	Preservation period
Documents to be retained for a minimum period of 8 years		
1.	Payroll Registers	8 years



2.	Bonus, Gratuity and other Statutory Records	8 years
3.	Time office Records and Leave Cards	8 years
4.	Unclaimed Wages Records	8 years
5.	Employees Information Records	8 years after separation
6.	Employees Medical Record	8 years after separation

J: 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.

2. Web Page Files : Internet cookies

All workstations Internet Explorer should be scheduled to delete Internet cookies once per month.

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 safeguard to retrieve lost information within 1 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.

In certain cases document will be maintained both paper and electronic form.