



## **REGANTO ENTERPRISES LIMITED**

**(formerly Known Vintron Informatics Limited)**

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**(POLICY FOR PRESERVATION OF DOCUMENTS AND  
ARCHIVAL OF DOCUMENTS)**

## **INTRODUCTION**

This policy is primarily framed based on Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as "Listing Regulations") and various provisions of the Companies Act, 2013.

Regulation 9 of the Listing Regulations mandates 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:

Provided that the listed entity may keep documents specified in clauses (a) and (b) in electronic mode.

Further, Regulation 30 (8) of the Listing Regulations also refers to an archival policy as per which all events or information, which have been disclosed to stock exchange(s) under Regulation 30, shall be hosted on the website of the Company for a minimum period of five years, and thereafter as per the archival policy of the company, as disclosed on its website.

Besides the above, as per the applicable provisions of the Companies Act, 2013, certain documents are required to be preserved permanently or up to a certain prescribed time.

Accordingly this policy has been framed, keeping in view particularly the requirements of the Listing Regulations and the provisions of the Companies Act, 2013.

## **OBJECTIVE**

The objective of this Policy is 'aiding employees of the Company in understanding their obligations in retaining physical documents and electronic documents'.

The policy is formulated to manage the Company's information in a structured manner, to retain information for as long as it has a business purpose, to satisfy statutory or regulatory requirements and Litigation requirements, if any, and to protect information which is vital to the Company.

## **SCOPE**

This policy covers all information created, received, managed and retained by the Company (including all its units and divisions), in hard copy and electronic records. Information, under this policy, includes all hard copy and digital information created or received in connection with the business of the Company including originals and copies of correspondence, recordings, work papers, video tapes, photographs, product specifications, reports etc. These guidelines will be valid for determining the preservation period for to all the documents, in electronic or physical form, and will be applicable to all the locations of the Company. It not only covers the various aspects on preservation of the Documents, but also the safe disposal/destruction of the Documents.

## **PRESERVATION POLICY**

Records shall be broadly classified as per following for retention:

Permanent Record: Permanent records are records which are of strategic importance and vital to the organization. These records shall be kept permanently, e.g. records and documents such as Memorandum and Articles of Association, Board and Committee Minutes, Registers which are required to be permanently maintained under the Companies Act or other applicable laws.

Other Records: Such records as are required to be maintained for minimum 8 years on account of statutory considerations and are important from the perspective of financial record keeping, e.g. books of accounts, vouchers, Financial Statements, invoices and all deeds / agreements which are the basis for the financial transactions should be preserved for minimum 8 years from the closure of the contract.

Temporary Records: Temporary records are the records which are required to be retained as long as it has a business purpose or are required to be retained as per relevant business regulations and as per the directions by Head of Department.

## **MODES OF PRESERVATION**

The Documents may be preserved in the following manner:

- Physical form
- Electronic Form.

The preservation of Documents should be such as 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 Authorized Person with preservation, so as to ensure integrity of the Documents and prohibit unauthorized access.

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.

The officer of the Company required to preserve the Document shall be Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law

## **ARCHIVAL OF DOCUMENTS**

Documents maintained/preserved by the Company, as mentioned in the above paras, shall be maintained/ preserved in the following manner:

### Documents maintained in physical form:

1. All information and/or documents pertaining to the current financial year and for one preceding financial year shall be kept handy and maintained in such a manner that their retrieval is easy and quick.
2. All documents pertaining to the period prior to the preceding financial year, shall be kept in good condition at least up to the minimum period specified for their maintenance / preservation as mentioned in the Annexures attached hereto. The said records should be also maintained in such a manner that their retrieval is easy and quick.

### Documents maintained in electronic form:

1. All documents pertaining to the current financial year and for the preceding financial year shall be maintained on server, and backup be maintained on scheduled time and day. The documents shall be maintained in such a manner that their retrieval is easy and quick.
2. Back up of all documents pertaining to the period prior to the preceding financial year shall also be maintained on server in good condition at least up to the minimum period specified for their maintenance / preservation. The said records should be also maintained in such a manner that their retrieval is easy and quick.

## **DISPOSAL OF REGISTERS/DOCUMENTS**

The registers/documents mentioned above may be destroyed in accordance with the provisions contained in the Act and the SEBI Laws after approval of the Board and in the presence of the Company Secretary and the CFO.

The Board shall review, at least once in every three years, the list of documents that may be destroyed. The Company shall maintain a Register of Records and Documents Destroyed, containing the particulars of the documents destroyed, the year to which it pertains, mode of destruction etc., each entry in this register shall be verified by the Company Secretary and countersigned by the CFO.

The concerned employee shall be responsible for taking in to account the potential impact on preservation/destruction of the documents in their work area and their decision to retain/preserve/destroy documents pertaining to their area of work.

## **REVIEW**

The policy has been approved by the Board of Directors of the Company. The Board, however, may review this policy as and when it deems appropriate. This policy is being formulated keeping in mind the applicable laws, rules, regulations and standards in India. If there is an amendment in such laws, rules, regulations and standards, allowing standards, then this Policy shall be deemed to have been amended to the extent of such amendment. Also, if due to subsequent amendment in the laws, this Policy or any part hereof becomes inconsistent with the law, the provisions of law shall prevail and this Policy shall be deemed to be amended to that extent.

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