

# **POLICY ON PRESERVATION OF DOCUMENTS**

## **Preamble**

Records and archives form an essential and significant part of company's resources. Records are a basic tool of administration. They are the means by which operational processes and functions are performed.

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, requires the company to frame a policy on preservation of documents.

In compliance to the aforesaid Regulations, this policy is framed for the purpose of systematic, categorization, maintenance, retention of documents received or created in the course of business.

## **Scope**

The policy is formulated to establish the framework needed for effective preservation/maintenance of documents and records required to be maintained by the Company.

## **Objectives**

To facilitate efficient and effective operation of our company; we are implementing the following Policy on document preservation. All business records should be kept no longer than the period necessary for the proper conduct of the Company business. Except as designated below, or as specifically exempted by the CEO (Administration), all documents shall be retained no longer than Eight (8) years. This policy shall cover all business records of the Company, including written, printed and recorded matter and electronic forms of records. The CEO (Administration) and the Compliance Officer jointly would be responsible for overseeing the implementation of the Policy.

This policy is framed as per requirement of Regulation 30 (4) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

## **Definitions**

"Applicable Law" means any law, statutory rules & regulations, or standards applicable on the Company under which any guideline / provision with regard to the preservation of the Documents has been prescribed.

"Board" means the Board of Directors of the Company.

"Company" means Lee & Nee Softwares (Exports) Limited.

“Current Document(s)” means any Document that still has an ongoing relevance with reference to any ongoing contract, litigation, proceedings, complaint, dispute, or any like matter.

“Document(s)” refers to notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, registers and or any other record (including required under or in order to comply with the requirements of any Applicable Law) maintained on paper or in Electronic Form and does not include multiple or identical copies.

“Electronic Form” means maintenance of documents in any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company.

“Maintenance” means keeping Documents, either physically or in Electronic Form.

“Preservation” means to keep in good order and to prevent from being altered, damaged or destroyed.

“Regulations” means the Securities Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

## **Policy on Preservation**

### **Classification based on preservation period**

Based on preservation duration, the company shall classify the documents in following categories. For Policy documents, the preservation period starts on the date of introduction of revised version.

#### *a) Documents whose preservation shall be permanent in nature:*

Certificate of Incorporation, Memorandum & Articles of Association, Minutes of Board/ General Meetings, Statutory Returns of the Company under direct taxes, Statutory Registers to be maintained permanently under Companies Act, 2013, Trade secrets, definitive documents for acquisition/ merger of/ with a company, etc. shall be preserved permanently.

#### *b) Documents with preservation period of not less than eight years after completion of the relevant transactions:*

Books of Account as defined in Companies Act 2013, Statutory Registers/ Documents required to be maintained **for 8 (eight years)** under Companies Act, 2013, and other Statutory Returns required as per concerned Act shall be preserved for a period of not less than eight years after the completion of the relevant transactions

*c) Documents with preservation period of less than eight years after completion of the relevant transactions:*

Customer orders, Records related to Court/ Arbitration/ Judicial/ Quasi-Judicial cases, etc.- shall be preserved for a period of less than 8 years subject to the condition that transaction/ agreement/ cases are not current and have been completed/ expired/ disposed of.

All such events or information which has been disclosed to Stock Exchanges and hosted on company's website for the purpose of shareholder communication shall be maintained for 5 Years.

Any other document not covered above at a), b) & c) shall be preserved by the concerned department during the preservation period as decided by the Compliance Officer in line with the requirement of law, if applicable.

Notwithstanding para herein above the documents shall **also** be preserved to meet the requirement under the regulations in the following manner:

a) Where there is a period for which a Document is required to be preserved as per Applicable Law, for the period required by Applicable Law.

b) Where there is no such requirement as per Applicable Law, then for such period till the document remains "Current".

c) In case of any other Document, for such period, as the Compliance Officer decides after taking a considered view about its relevance.

### **Modes of preservation**

The Documents may be preserved in:

- Physical form and/or
- Electronic Form.

### **Responsibility for preservation of Documents**

The responsibility for preservation of documents shall be with the Compliance Officer of the Company.

### **Authority to make alterations to the Policy**

The Chairman and Managing Director is authorized to make such alterations to this Policy as considered appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Regulation and other applicable laws. Any interpretation/ clarification related to policy shall be issued whenever necessary.

### **Destruction of Documents**

After retention period, Compliance Officer shall decide the records which are to be destroyed. A list of the Documents destroyed shall also be maintained. It shall state the brief particulars of the Documents destroyed, date of destruction.

### **Conversion of the form in which the Documents are preserved**

The physical Documents that are preserved may also be converted, whenever required or felt necessary, into electronic form to ensure ease in maintenance of records and efficient utilization of space.

### **Implementation of the Policy**

In case of conflict between this policy and any other procedures/ instructions/ guidelines etc., on preservation and archival of documents, the provisions of this policy shall take precedence. In specific cases of conflict being encountered with respect to preservation of a document created before the date of issuance of the policy, the Compliance Officer will be the approving authority to interpret such cases in the light of the subject policy being issued. The Compliance Officer shall ensure that this policy is not violated/ contradicted.

The policy will be effective from the date of approval by Board of Directors.