

ADOR WELDING LIMITED



ARCHIVAL POLICY

[Pursuant to Regulation 30(8) of Securities Exchange Board of India (Listing obligations and Disclosure Requirements) Regulations, 2015]

1. PREFACE

This Policy for Preservation of Documents will be known as "ADOR WELDING LIMITED Archival Policy", hereinafter referred to as 'Policy'.

This Policy is prepared in accordance with the applicable provision/s of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

This policy will come into effect from 01st December, 2015.

2. OBJECTIVE OF THE POLICY

- i. To preserve the records of the Company (Ador Welding Ltd.), in sync with the legal requirements and administrative convenience by implementing good archiving procedures & processes.
- ii. To outline the key actions necessary to ensure that the data collections of the Archive are conveniently accessible in a form that is fit for all end users.

3. SCOPE & APPLICABILITY

- i. Information and documents uploaded on the Company's website.
- ii. Records and documents at Head Office, all Plants & Area (Sales) Offices.
- iii. Both electronic and physical records.

4. DURATION OF MAINTAINING RECORDS

- i. All records shall be preserved for a minimum period of two (2) years.
- ii. The events / information under the SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015 shall be hosted on the website of the Company for at least 5 years, or such period as may be prescribed from time to time.
- iii. The physical as well as electronic documents are governed by the same legislative requirements and are subject to the same degree of confidentiality and care.

5. TYPES OF RECORDS

i. Tax Records

Tax records (Direct & Indirect Taxes) shall be preserved for at least eight (8) years immediately preceding the current accounting year or at least upto one (1) year after the Assessment by the Tax Authorities .

ii. Employment Records / Personnel Records

The records pertaining to recruitment, employment, personal information and complaints, if any, brought against the individual employees and actions taken by or against employees and correspondence reflecting performance reviews shall be preserved , for a minimum period of one (1) year after the person discontinues to be the employee of the Company.

iii. Board and Board Committee Materials

The Board & Committee Meeting minutes shall be retained in perpetuity in the minutes book at its Registered Office, or such other place as the Board of Directors may decide with a Board Resolution.

iv. Press Releases / Public Filings

The Company shall retain permanent / physical copies of all press releases and publicly filed documents under the theory that the Company should have its own copy to test the accuracy of any document, a member of the public can theoretically produce against that Company.

v. Legal Files

The legal documents should generally be maintained for a period upto one year of the outcome of the litigation.

vi. Marketing and Sales Documents

The Company shall keep final copies of marketing and sales documents for at least upto three (3) years. An exception to the three (3) year policy will be sales invoices, contracts, leases, licenses and other legal documentation.

vii. Development / Intellectual Property and Trade Secrets

Development documents in their final form (e.g., patents and copyrights) shall be preserved perpetually.

The documents detailing the development process are often also of value to the Company and are protected as a trade secret where the Company:

- derives independent economic value from the secrecy of the information; and
- the Company has taken affirmative steps to keep the information confidential.

viii. Contracts / Agreements

Final copies of all contracts / agreements entered into by the Company shall be retained for at least 2 years beyond the life of the contract / agreement, and longer in the case of publicly filed contracts / agreements, as may be decided by the Compliance Officer.

ix. Inter-Office Communication

All the inter-office communication, Inter office Memos, shall be preserved for a period of eight (8) years.

x. Administrative Guidelines & Policies

The Administrative Guidelines and Corporate / HR Policies are to be retained permanently, with all the versions of revision.

xi. Historical records

The records may no longer be of use to the Organization, but by virtue of their age or research value having historical interest or significance to the Organization, shall be preserved permanently, e.g. Awards, recognitions, old photographs of factory / products, etc.

xii. Electronic Mail

E-mail that needs to be saved should be either:

- printed in hard copy and kept in the appropriate file; or
- downloaded to a computer file and kept electronically or on disk as a separate file.

The retention period depends upon the subject matter of the e-mail, as may be covered elsewhere in this policy.

6. CONTROL OF RECORDS

i. Version control

Earlier versions (i.e. drafts) of a document may be deleted once the previous versions are no longer needed to create future records. However, the documents containing significant decisions, reasons & actions and those containing significant information that is not contained in the final form of the record must also be preserved along with the final version. This applies to both paper and electronic drafts.

ii. Security

Records shall be made accessible to authorised users. Employees of the Company enacting the normal course of their duties will have access to relevant records of the Company.

iii. Storage

- Records shall be stored in conditions that are clean, dust free and secure, with lowest risk of damage from fire, water, dampness, insects and rodents, etc.
- The records shall be kept away from direct sunlight and other sources of light and heat. The storage area shall be well ventilated and ideally maintained at a stable temperature and humidity.
- Records in formats such as photographs, maps or computer disks shall have specialised storage conditions and handling process that can take into account their specific physical and chemical properties.
- Irrespective of format, records of continuing value shall have higher quality storage and handling, to preserve them for as long as that value exists.

7. METHOD OF DESTRUCTION OF DOCUMENTS

i. Destruction of paper records

Paper records shall be shredded off / placed in security bins. They shall never be placed in unsecured bins or rubbish tips.

ii. Destruction of magnetic media

Records stored on magnetic media, such as CDs, DVDs, floppy disks, etc. shall be destroyed by reformatting, at least once. Deleting files from magnetic media is not sufficient to ensure the destruction of the records. Backup copies of the records shall also be destroyed.

iii. Destruction of optical media

Records held on optical media such as rewritable disks shall be destroyed by cutting, crushing or other physical means.

8. AUTHORITY & RESPONSIBILITY

- i. Compliance Officer shall ensure that the Company complies with the legislation and standards specified in this Policy.
- ii. The respective Functional Heads shall be responsible for implementing and maintaining sound record keeping practices within their respective units.
- iii. Every employee shall be responsible for making and keeping the necessary / required records of his / her own job / function / area of activity.

9. REVIEW OF THIS POLICY

- i. The Compliance Officer will review this policy annually or as often as he / she considers it necessary;
- ii. The Board may change / revise this policy, if required by law, from time to time by resolution.
- iii. If the terms of this policy differ from any existing or newly enacted law, rule, regulation or standard governing the Company, the law, rule, regulation or standard will take precedence over these policies and procedures until such time this policy is changed / revised to conform to the law, rule, regulation or standard.

10. APPROVED & ADOPTED

This policy was approved by the Board of Directors on Thursday, 29th October 2015.

For **ADOR WELDING LIMITED**

ARUNA B. ADVANI
EXECUTIVE CHAIRMAN

SATISH M. BHAT
MANAGING DIRECTOR