

HINDUSTAN WIRES LIMITED

POLICY ON PRESERVATION OF DOCUMENTS

1. PURPOSE

Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) imposed certain obligations and disclosure requirements on all the listed entities. One of the common obligation for all the listed entities pursuant to Regulation 9 is to formulate and put in place a policy for preservation of documents.

The Board of Directors of Hindustan Wires Limited has approved a policy in the Board Meeting held on 04-11-2015 for “Preservation of Documents” to comply with the requirements of Regulation 9 of the Listing Regulations.

This Policy will be applicable to the Company effective 1 December, 2015.

2. OBJECTIVE

The purpose of this policy is to have a framework for the preservation of documents of the company which shall classify them in at least two following categories as follows:

- Documents whose preservation shall be permanent in nature;
- Documents with preservation period of not less than eight (8) years after completion of the relevant transactions.

Provided further that the Company may keep the documents as specified above in electronic mode.

3. RECORDS WHICH SHALL BE PERMANENT IN NATURE

- a) Documents relating to incorporation of Company.
- b) Documents relating to Registration of Company with various authorities including Registration under various Tax Laws.
- c) Documents relating to licenses obtained by the Company for the operations of the Company.



- d) Documents in respect of Acts and Regulations where there is no time limit for raising any demand like Social Welfare Legislation i.e. Provident Fund & ESI matters.
- e) Original Minute Books of meetings of Board of Directors and Committee meetings.
- f) Intellectual property documents and licenses including copyrights, trademarks, patents and industrial designs.
- g) All documents relating to existing immovable properties and other existing fixed assets including investments.
- h) Approval of drawings for construction of buildings/sheds from the concerned authority and approval of factory building drawings under the Factory's Act.

4. DOCUMENTS WITH SPECIFIC PREVERSATION PERIOD

- (a) **Tax Records**: Tax records include but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, documents concerning the Company's revenues, tax filing, tax returns, tax assessments, appeal papers etc.

Tax records may be retained for at least Ten years from the date of filing the applicable return or for a period of Ten years after a final order has been received with respect to any matter which was under appeal before any Authorities/Court.

- (b) **Employment Records/Personnel Record**: The Company is required to keep certain documents relating to recruitment, employment and personnel information, performance review, complaints by or against any employee, action taken by or against any employee including domestic inquiry and litigations.

The documents relating to employment or personnel information shall be retained till the employee is in service and up to Ten years even after cessation of service of employee. In case of labour & employee disputed cases Court records should be kept at least up to Ten years even after the final decision in the matter.



- (c) **Board and Board Committee Materials:** Original Meeting minutes should be retained in perpetuity in the Company's minute book. A clean copy of all Board and Board Committee materials should be kept as long as they remain current or for at least Ten financial years, whichever is later.
- (d) **Press Releases/Public Filings:** The Company should retain permanent 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. Press releases / public filings related documents should generally be maintained for a period of at least Ten years or till the completion of the case, whichever is later.
- (e) **Legal Files:** Legal counsel should be consulted to determine the retention period of particular documents, but legal documents should generally be maintained for a period of at least Ten years even after the completion of the case.
- (f) **Marketing and Sales Documents:** The Company should keep final copies of marketing and sales documents for the same period of time it keeps other corporate files, generally Ten years.
- (g) **Contracts:** Final execution copies of all contracts entered into by the Company should be retained. The Company should retain copies of the final contracts for at least Ten years beyond the life of the agreement, and longer in the case of publicly filed contracts.
- (h) **Listing Records:** All Listing records shall be preserved for a minimum period of at least Ten years from the date of completion of relevant transaction.
- (i) **Records at Registrar & Transfer Agent :** All records relating to issue and transfer of shares shall be maintained by RTA for at least Ten years.
- (j) **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.



Electronic documents will be retained as if they were paper documents. Therefore, the electronic files should be maintained for the appropriate amount of time depending upon the subject matter of the email and should be determined primarily by the application of the general guidelines affecting document retention. If a user has sufficient reason to keep an e-mail message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods should be tested on a regular basis.

5. ARCHIVAL POLICY

The Company shall ensure that all the information disclosed on the Company's website (www.hwlgas.com) is maintained live for the period as per the requirement under the listing obligations and in archive for a period of Five years.

6. GENERAL

Notwithstanding anything contained in this Policy, the Company shall ensure to comply with any additional requirements as may be prescribed under any laws/regulations either existing or arising out of any amendment to such laws/regulations or otherwise and applicable to the Company, from time to time.

7. RECORDS MAINTANANCE AND STORAGE

All records in physical form are to be maintained by the Records/respective departments at the respective locations.

8. DISPOSAL OF RECORDS

Physical records after the preservation period shall be disposed of as far as possible by using a shredder. In case of electronic record the user shall use the "permanent delete" function to permanently dispose of electronic records.

9. AMENDMENT

The Board of Directors of the Company reserves the right to amend or modify this Policy in whole or in part, as may be required, at any point of time.

For Hindustan Wires Ltd.

(R.K. Gupta)
Executive Director