

# Policy on Preservation and Archival of Documents

**Version 1.3**

**Last review date: 23/10/2024**

Revision History

Version No.	Release Date	Function	Reviewed by	Approved by	Description of Change
1.0	20/01/2016	Corporate Secretarial	Company Secretary & Compliance Officer	Board of Directors	Original Policy
1.1	26/03/2019	Corporate Secretarial	Company Secretary & Compliance Officer	Board of Directors	Change of Company Name
1.2	06/02/2021	Corporate Secretarial	Company Secretary & Compliance Officer	Board of Directors	Renamed the Policy and benchmarked the same with good practices of other companies
1.3	23/10/2024	Corporate Secretarial	Company Secretary & Compliance Officer	Board of Directors	Benchmarking of the Policy against industry standards

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## 1. Introduction

Companies are required to maintain certain types of corporate records for specified periods of time under applicable laws. Birlasoft Limited ensures that important documents including electronic resources are safeguarded.

SEBI (LODR) Regulations, 2015, require the Company to have a policy on Preservation & Archival of Documents. Accordingly, this Policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business. This Policy contains guidelines on documents that need to be maintained, how long certain documents should be retained, how should the documents be accessed and retrieved when they are needed and how and when those documents should be disposed off, if no longer needed.

This Policy serves as a guide to employees of the Company in understanding their obligations in preserving the records of the Company as per the statutory & regulatory requirements.

This Policy also outlines the manner in which documents hosted on the website of the Company, pursuant to SEBI (LODR) Regulations, 2015, shall be archived.

## 2. Definitions

a) In this Policy unless the context otherwise requires:

- i. **“Act”** means the Companies Act, 2013, and rules issued thereunder.
- ii. **“Applicable Law”** means all laws, by-laws, rules, regulations, orders, ordinances, protocols, codes, guidelines, policies, notices, directions, judgments, decrees or other requirements or official directive of any governmental authority or person acting under the authority of any Governmental Authority and/or of any statutory authority in India.
- iii. **“Board”** means the Board of Directors of the Company.
- iv. **“Company”** means Birlasoft Limited.
- v. **“Current Document(s)”** means any Document that still has an ongoing relevance with reference to any ongoing litigation, proceedings, complaint, dispute, contract or any like matter.
- vi. **“Document(s)”** refers to papers, notes, agreements, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of any Applicable Law for the time being in force or otherwise, maintained on paper or in Electronic Form and does not include multiple or identical copies.

- vii. **“Electronic Record(s)”** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000, as may be amended from time to time.
  - viii. **“Electronic Form”** means 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 or otherwise the Company has control over its access.
  - ix. **“Policy”** means this Policy on Preservation and Archival of Documents.
  - x. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
  - xi. **“SEBI (LODR) Regulations, 2015”** means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.
- b) Unless the context otherwise requires, words and expressions used in this Policy and not defined herein but defined in the Act or the SEBI (LODR) Regulations, 2015, as amended from time to time, shall have the meaning respectively assigned to them therein.

### 3. **Classification of Documents to be preserved/retained & Principle of responsibility of employees for preservation and custody of documents**

The preservation of Documents shall be done in the following manner:

- a) Where the period prescribed for preservation of a Document is permanent as per Applicable Law – to be preserved permanently.
- b) Where any other period is prescribed for preservation of a Document as per Applicable Law – to be preserved for the period required by Applicable Law.
- c) Where there is no such requirement as per Applicable Law, then to be preserved for such period as the document pertains to a matter which is “Current”.
- d) In case of any other Document, for such period, as a competent officer of the Company, required to handle or deal with the Document, takes a considered view about its relevance; Provided that in general, a Document may be preserved for a period of 3/5/8 years from the date on which the Document originated.
- e) Each Function or department within the Company shall determine the nature & period of documents to be preserved in accordance with the statutory requirements.
- f) All the Employees are responsible for considering the potential impact on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their work area.

#### 4. Modes of Preservation

- a) The Documents may be preserved in:
  - i. Physical form; or
  - ii. Electronic form.
- b) 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.
- c) The preserved Documents must be accessible at all reasonable times. Access may be controlled by the respective Functions/departments, so as to ensure integrity of the Documents and prohibit unauthorized access.

#### 5. Destruction of documents

- a) Destruction of Documents, as a normal administrative practice, usually occurs when the records are duplicated, becomes redundant, or created for short term use only. This applies to both Physical and Electronic Documents.
- b) The Functions/department heads respectively shall be responsible for the ongoing process of identifying the records, which have met the required preservation period and overseeing their destruction.
- c) The temporary Documents, excluding the Current Document(s), shall be destroyed after the relevant or prescribed period by the concerned department in whose custody the Documents are stored, after the prior approval of the Department Head or any other authority (i.e. Managing Director/Chief Financial Officer) as required under the Applicable Law pursuant to which the Documents have been preserved. The categories of Documents, which may be destroyed as normal administrative practice, are listed below –
  - catalogues;
  - copies of press cuttings, press statements or publicity material;
  - letters of appreciation or sympathy, or anonymous letters;
  - requests for copies of maps, plans, charts, advertising material;
  - facsimiles where a photocopy has been made;
  - drafts of reports, correspondence, speeches, notes, spread sheets, etc.; and
  - routine statistical and progress reports compiled and duplicated in other reports.
- d) The documents may be destroyed in any of the following manner:
  - i. Recycle non-confidential paper records;
  - ii. Shred or otherwise render unreadable confidential paper records; and
  - iii. Permanently delete or destroy electronically stored data.

#### 6. Suspension of record disposal in the event of litigation or claims

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning the Company or commencement of any litigation against the Company, then the concerned employees of the Company responsible for

handling any document(s) which may be connected with the investigation or litigation shall be informed by person in charge of handling of investigation or litigation etc., and thereafter any further disposal of related documents shall be suspended until further instructions.

**7. Archival of documents posted on website**

All the disclosures made by the Company to the Stock Exchanges under Regulation 30 of the SEBI (LODR) Regulations, 2015, shall be hosted on the website of the Company for a minimum period of 5 years. Thereafter, such disclosures shall be kept in the archives of the Company for a period of 2 years. In case the aforesaid disclosures are required by any applicable law or regulation to be hosted for a period longer than that mentioned above, such disclosures shall be hosted on the website of the Company for such longer period.

**8. Review and amendment of the Policy**

The management of the Company may review this Policy as and when deemed necessary and may recommend amendments to the Board for approval.

*In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.*