

**LONGVIEW TEA COMPANY LIMITED**

**Policy for Preservation and Archival of Documents**

**[Pursuant to Reg. 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015]**

**1. PURPOSE**

The purpose of this Policy is to ensure that necessary records and documents of the Company are adequately protected and maintained and to further ensure that the records which are no longer required by the Company are discarded at the proper time. The Company therefore, formulates this policy, in pursuance to Regulation 9 and 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 on preservation and archival of documents and to provide guidelines concerning the length of time for which official records should be retained under ordinary business circumstances, as well as safe destruction/disposal of documents.

**2. APPLICABILITY**

This Policy applies to:

- a) All physical records generated in the course of the Company's operations, including original documents.
- b) All Electronic Documents including E-mails, Web files, Text files, PDF documents, all Microsoft Office documents or other formatted files.

This policy establishes retention or destruction schedules for specific categories of records in order to ensure legal compliances, and also to accomplish other objectives including cost management. Several categories of documents that require special consideration are identified below. While minimum retention periods are suggested, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention as well as any other pertinent factors.

The Company expects all employees to fully comply with retention of records or destruction policies.

### **3. PRESERVATION OF DOCUMENTS**

The Company shall maintain and preserve all its documents as per the requirements and provisions of the Companies Act, 2013 and its rules, the Secretarial Standards, Listing Regulations and any other law, rules and regulations as may be applicable to the Company.

As per Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as the "Regulations") the Company is required to classify documents in at least two categories which are as follows :-

a) Documents whose preservation shall be permanent in nature :

- i) Memorandum and Articles of Association
- ii) Register of Members and Index of Members
- iii) Register of renewed and duplicate share certificates
- iv) Minutes of the meetings of Shareholders of the Company
- v) Minutes of meetings of the Board of Directors and of Committee meetings of the Company
- vi) Register of Charges
- vii) Register of loans, investment or guarantee made by the Company
- viii) Register of Directors and KMP
- ix) Register of contracts with related party and contracts and bodies etc. in which directors are interested
- x) Any other document specified in any law applicable to the Company, required to be preserved permanently.

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

- i. All notices pertaining to disclosure of interest of Directors
- ii. Office copies of all letters, notices, agendas and other related papers related to board meetings, general meetings
- iii. Disclosures under SEBI regulations

- iv. Copies of all Annual Returns along with all certificates and documents required to be annexed thereto
- v. Attendance Register for Board/Committee/General Meetings
- vi. Books of account
- vii. Tax records – Tax records including, but not limited to documents concerning tax assessments, tax filings, proof of deductions, tax returns, appeal preferred against any claim made by the relevant tax authorities
- viii. Legal documents including but not limited to contracts, agreements, legal opinion, orders passed by nay court or tribunal, documents relating to any case pending in any court or tribunal, documents related to property matters etc.

#### **4. MODE OF PRESERVATION**

The Documents may be preserved in physical or electronic form as per applicable provisions of law, regulations and rules. The preservation should be such so as to ensure that there is no tampering, alteration, destruction, or anything which endangers the content, authenticity, or accessibility of the documents other than disposal of the documents as permitted under this policy. All records shall be maintained in prescribed formats, if any, as amended from time to time under the various rules and regulations.

#### **5. CONFIDENTIALITY AND OWNERSHIP :**

All records are the property of the Company and employees are expected to hold all business records in confidence and to treat them as the Company's assets. Records must be safeguarded and may be disclosed to outside parties only under proper authorization.

#### **6. DESTRUCTION OF DOCUMENTS**

After the expiry of the retention period, the preserved documents may be destroyed after taking approval of the Authorised Person. The records of the destroyed documents shall be maintained as per Annexure "A" .which shall state brief particulars of the documents destroyed, date of disposal/destruction and mode of destruction.

If it is believed that Company records are relevant to litigation or potential litigation (i.e. a dispute that could result in litigation) then those records must be preserved until the

respective Department head or Legal Consultants or Advocates involved determine that the records are no longer needed.

## **7. Archival of documents**

In terms of Regulation 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, a listed entity shall disclose on its website all such events or information which has been disclosed to the stock exchange under Regulation 30, and such disclosures shall be hosted on the website of the company for a period of 5 years and thereafter as per the archival policy of the listed entity, as disclosed on its website.

In view of the above, the Company has framed this archival policy to determine the period for which the information required by the Company to be disclosed on its website, will be hosted on the website and the period for which it will be archived thereafter.

### **Archival Period**

All information which has been disclosed to the Stock Exchange on which the Company is listed and which has been hosted on the website, shall be available on the Company's website ([www.longviewtea.org](http://www.longviewtea.org)) for a period of 5 years from the date of uploading of the same.

After the period as mentioned above has elapsed, it shall be archived for a period of 3 years and thereafter the same may be retained or removed as may be considered appropriately by the authorized person.

## **8. Amendments**

This policy may be reviewed and amended by the Board of Directors, as and when deemed considered necessary, subject to the condition that such alteration shall be in consonance with the provisions of the Act and Regulations.

The policy shall be disclosed on the website of the Company as approved by the Board of Directors at its meeting on February 12, 2016.

The aforesaid policy has been approved at the meeting of the Board of Directors of the Company held on February 12, 2016. Policy shall also be hosted on the website of the Company ([www.longviewtea.org](http://www.longviewtea.org)).

**Annexure-A**

**Format of the Register of documents disposed/destroyed**

<b>Particulars of document along with provision of applicable law</b>	<b>Date and mode of destruction</b>	<b>Initials of the authorized person</b>

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