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**POLICY ON PRESERVATION,
CONTROL AND DESTRUCTION
OF DOCUMENTS**

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Policy on Preservation, Control and Destruction of Documents

(Reviewed and approved by the Board of Directors of the Company on February 13, 2021)

1. Preamble

This policy for preservation of documents is required to be maintained or preserved under the provisions of Securities and Exchange Board of India Act, 1992 through its regulations and circulars issued from time to time, Securities Contracts (Regulation) Act, 1996, Depositories Act, 1996 and the provisions of the Companies Act, 1956/ 2013 and rules, regulations, circular or guidelines made thereunder.

Securities and Exchange Board of India (SEBI) had specified that the policy dealing with the documents to be preserved shall include not only the documents required to be preserved under securities laws but also under other laws /statutes applicable to a company. SEBI has also through its circulars made it mandatory to have a policy for accountability of blank stationery and destruction of documents. Accordingly, this policy has been devised to cover preservation of documents under all the laws applicable to the Company, managing the inventory of blank stationery and destruction of records/stationery.

2. Introduction

Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 (“Regulations”) stipulates that every listed company shall have a policy on preservation of documents.

SEBI circular dated 20th April, 2018 has specified that the Registrar & Share Transfer Agents (“RTAs”) and company shall frame a written policy and shall maintain strict control of stationery including blank certificates, dividend/interest/redemption warrants. SEBI circular dated 20th April, 2018 has also specified that RTAs shall maintain a register containing details of records and documents destroyed.

Deviation from this policy shall require preauthorization in writing from Company Secretary and Compliance Officer. Deviation shall be considered only for exceptional cases under genuine circumstances.

3. Scope

Documents referred to in this Policy shall include the documents maintained in physical as well as in electronic format,

Stationery referred to in this policy shall include Blank stationery viz., blank Share certificates and dividend, interest warrants and used stationery viz, returned undelivered share certificates, dividend/interest warrants and un-encashed dividend/interest warrants

This Policy stipulates guidelines classifying documents in following manner, basis period of preservation, post which such documents may be destroyed:

- a) Documents whose preservation shall be permanent in nature;
- b) Documents which are required to be preserved for not less than eight (8) years after completion of the relevant transaction;
- c) Other documents which are preserved as per standards prescribed under various statutes or procedures or practices of the company.

This policy stipulates guidelines for maintenance and destruction of documents, accounting and usage of blank stationery and stationery requiring destruction.

4. Terms and Definition

4.1 Documents-The term “documents” under this Policy shall include but shall not be limited to any form of recorded information created or maintained for use at a later date, originating in or received by the Company for the conduct of business operations and activities, including paper, computer disk or tape software video, e-mail message or other recorded information, regardless of the medium, created or received by the Company for use at a later time, useful for the conduct of business operations and books of accounts, invoices, vouchers, bills, bank account statements activities, notice, requisition, order, declaration, form, return, statutory registers, license, registration, title deeds, clearances under provisions of any law, drawings, designs, intellectual property, drawings, designs, blueprints, photographs, etc. The term document shall not include the structured data such as data base etc

4.2 Vital Documents- Vital documents are fundamental business documents essential for continuing business operations including but not limited to documents which pertain to:

- a) Prove legal ownership and the right to do business and include documents of the properties owned;
- b) All shareholder ledger records, documents supporting movement of shares, title changes viz., transfer deeds, transmission dockets, deletion of name, name change and General profile changes viz., address, bank details, nomination etc.,
- c) Signed Annual Accounts Fundamental to the business operations like JVs, shareholder agreements, and other major agreements;
- d) Statutory permissions, approvals and registrations;
- e) Company’s technology and IP rights;
- f) Documents like Board, Committee, and Shareholder’s meetings Minutes
- g) Any other document / record, absence of which could cause major problem in running of operations or supporting Company’s claims or which has a permanent/long lasting value for the Company even after the expiry of legal preservation period; and
- h) Important court orders in cases of schemes of arrangement or those affecting business /operations / functioning of the Company.

4.3 Historical Documents- Historical documents shall include documents signifying important decisions, milestones and activities in a Company’s history, whether successes or failures, past or present. They may be in the form of documents like minutes, letters, memos, studies, or special reports or in form of objects such as pictures, slides, tools, signs, product samples and packaging, including similar documents of the entities which are merged into the Company in the past.

4.4 Stationery- The term stationery referred in this policy shall include Blank stationery viz., blank certificates (share, debenture or bond) and dividend, interest warrants and used stationery viz, returned undelivered certificates, cancelled or mutilated certificates, exchange certificates or certificates surrendered for redemption or exchange, dividend/interest warrants and en-cashed/un en-cashed dividend/interest warrants.

5. Usage & Reconciliation of stationery

Up-to-date details of usage & reconciliation of all blank stationery including securities certificates shall be maintained by the company or through its third party agency/RTA as per the provisions of the circulars/Guidelines issued by SEBI and any other law.

6. Preservation of Documents

Documents in all formats (whether in physical or electronic) shall be preserved in an easily retrievable manner during its preservation period or for as long as they are likely to serve a commercial or reputation purpose. For this purpose, the Company shall take necessary steps to ensure that the

documents are stored in such manner so as to avoid possibility of serious accidental or malicious damage to the documents. Documents shall be stored in such a way that they are free from the risk of damage arising out of fire, floods, riots, termites/white ants, rodents etc. Functional head shall ensure that there is no tampering, alteration, destruction or anything which endangers the content, characteristics, authenticity, utility or accessibility of the documents during the preservation.

At the expiration of preservation period, the documents shall be destroyed only in accordance with the prescribed destruction procedure.

7. Preservation Period

Preservation period for documents shall be the period for which such documents are required to be preserved by law/ SEBI circular or this policy or any extended period as may be decided by the Board of Directors/ Official(s) authorized by the Board of Directors from time to time.

Documents which are required for reference in any legal dispute shall be preserved for eight (8) years after the legal dispute is finally disposed off or end of limitation period whichever is later.

The information and/or documents uploaded on the website shall be maintained for a period of five (5) years from the date of upload or till the information is relevant, whichever is later. Thereafter, the information and/or documents can be removed from the main website. The backup of the information and/ or documents which are removed from main website shall be preserved for a minimum period of two (2) years and thereafter can be deleted / disposed-off permanently.

E mails shall be preserved (backed-up) as per IT policy of the Company.

Historical and Vital documents shall be identified and safeguarded and shall be kept permanently in fire proof cabinets.

At the expiry of prescribed preservation period, the respective functional head shall review the need for further usage of such documents and may decide for preservation of such documents beyond the preservation period. Functional head shall make such decision for preservation of documents as per business requirements.

Notwithstanding the general guidelines, care shall be taken by the respective functional head to ensure that documents of special nature which may be required for reference in future, such as unsatisfied claims by or against the Company or the like, shall be preserved beyond its preservation period, according to specific business needs.

The preservation period starts with the conclusion of financial year in which document has been formed or the last entry was made. The preservation period of agreement(s) starts with the end of financial year in which the agreement period expires.

8. Responsibility

Records management within a function shall be the responsibility of the Functional Head. Each Functional Head may appoint a competent official(s) in his function to act as Records Coordinators/ Record Keeping Head, who shall manage and preserve the documents of the respective function as per this policy with the guidance from Functional Head. Functional Head shall be the single point accountability (SPA) for preservation of documents.

In the eventuality of a need to transfer documents between department/site on account of any internal re-organisation or statutory requirements, the Functional Head of transferor department shall ensure that all relevant documents are handed over to functional head of the transferee/department/site. The Functional Head of the transferor department shall identify the documents to be transferred, make an inventory of such documents by preparing a list of such documents along with the record preservation schedule of the same, and hand over the same to the Functional Head of transferee department/ site and obtain an acknowledgment.

The Functional Head of transferee department/ site shall be responsible for updating his record preservation schedule based on the documents received from the other department/site. The Functional Head of transferee department/ site shall review the preservation period(s) and modify the same while ensuring that minimum preservation period as per this policy/ statutory requirement continues to be met. The Functional Head of transferee department/site shall inform the Company Secretary and Group Controller of the fact of such transfer counter.

9. Destruction of Records

9.1 Procedure

Records shall be destroyed in accordance with the terms of the Policy in the normal course of business after the applicable retention period has expired, and with the approval of the company secretary & Compliance officer.

The Functional Head may scan any document which may be required for future reference. As established retention period expires, documents/records will be destroyed on an ongoing basis to prevent excessive accumulation and eliminate unnecessary costs of managing obsolete records. Each Functional Head shall review and verify on a periodic basis, that records are being managed in accordance with the Policy. Below mentioned steps are required to be followed for documents/ records destruction:

- a) After record retention period is over - Check with the Policy / Retention Schedule to confirm that records are not marked as "Hold".
- b) If it exceeds retention period, Functional Head or third party agency to prepare a list of records to be destroyed.
- c) Written approval to be obtained from the compliance officer or stake holder for discard of records.
- d) Compliance officer or concerned stake holder will send a formal sign off or rejection to destroy documents/ records.
- e) Proper and accurate records of destruction of documents shall be maintained by each Functional Head for future reference.
- f) The record of destruction shall have sign off by the compliance officer or stakeholder nominated by compliance officer and the authorized official of third party official.

9.2 Removing Records for Destruction

The documents/ records that are approved for destruction shall be removed from their filing location and brought to a staging area. The Functional Head or other authorized person shall verify that the records correspond to those identified in the list of destruction, before forwarding the records for destruction.

9.3 Methods of Destruction

Subject to applicable provisions of any act, rules, regulations, notifications, circulars, guidelines, etc. for the time being in force dealing with disposal and destruction of documents, the documents shall be destroyed in an environmentally friendly manner. There are three recommended methods of documents/ records destruction, based on nature and sensitivity of records to be destroyed:

- a) Shredding: Records shall be cut with a mechanical shredder before releasing for destruction.
- b) Waste Paper: Documents may be discarded with department.
- c) The documents maintained in electronic form shall be destroyed as per IT policy of the Company or the third party agency in consultation with the company,

One may use any of the above methods depending on the nature of records.

9.4 Register of Destruction of Documents/ Record

RTAs shall maintain a register containing details of records and documents destroyed. The register shall inter alia contain the following particulars: description of the records and documents destroyed, name of authority authorising the destruction, date of authorization of destruction, destroyed in whose presence (with signature) and date of destruction. The authenticity of the register shall be verified during internal audit. The register shall be maintained till perpetuity.

9.5 Establishing “holds” on Records

Refers to a direction from ‘Legal’ to preserve certain data held by the employees or in the database of the Company. All retention periods under this Policy shall be suspended with respect to documents subject to Legal Hold and all documents subject to Legal Hold are to be preserved in strict accordance with Legal Hold instructions and shall not be altered, destroyed or deleted until Legal instruction is received that the Legal Hold has ended.

10. Compliance with Law

In the event, any provisions contained in this Policy is found to be inconsistent with any law, rule, regulation or standard governing the Company, the law rule, regulation or standard will take precedence over this Policy.

11. Amendments to the Policy

The Board shall have the power to clarify any doubts or rectify any anomalies that may exist in connection with the effective execution of this Policy. The Board reserves the right to amend this Policy from time to time based on changing requirements as may be prescribed by SEBI/Stock Exchange(s) or any other appropriate Statutory Authority.

12. Review

The Board of directors of a company shall review the Policy, from time to time, to ensure its effectiveness.

13. Disclosure of the Policy

The Company shall disclose this Policy on its website. The necessary disclosure, if any, about the policy will also be made as per the requirements of LODR Regulations and Companies Act 2013.