



Let's Succeed Together! ©
UNIVASTU
INDIA LTD

RECORD RETENTION & ARCHIVAL
POLICY

Record Retention Policy

PURPOSE:

This Policy has been adopted for systematic identification, maintenance, review, retention and disposal of records/ documents generated by **UNIVASTU INDIA LTD** during the course of business.

Scope:

- This Policy applies to **UNIVASTU INDIA LTD** (the Company).
- This Policy applies to records maintained in any media generated during the course of business.
- Records include any document, report, form, register and correspondence generated for business, product, people, legal/regulatory and customer needs and requirements.
- Records can be maintained in hardcopy and or electronic media, including microfilm, magnetic tape or other electronic data processing storage media.

POLICY STATEMENT:

1. All records will be retained for a minimum period shown in Annexure 1, unless they are required to be retained by law for a longer period of time or due to any pending litigation, pending assessments and order by a competent authority, etc. The records shall be destroyed/ disposed of within six months after the period set in Annexure 1. If any record is to be retained for a longer period (except due to pending litigation/ order from a competent authority), the Legal department must be notified regarding the reason for the request, and the Legal department shall determine as to whether the record(s) shall be retained further.
2. All records not necessary for legal or business reasons shall be destroyed as per this Policy to effectively manage the cost of storing & handling and to ensure timely disposal of unwanted record.
3. All original documents like permits, licenses, property title documents, Joint Venture Agreements etc. shall be retained in a fireproof cabinet.
4. A back up of all important and critical documents shall be retained at a remote location.
5. Disposal of records shall take place as per the procedure laid down below.
6. Records that are not otherwise subject to retention for business reasons may need to be retained due to factors like pending litigation or government investigation etc. The Legal department shall be immediately notified in such

circumstances. In case of litigations, the Legal department shall notify the appropriate department(s) and direct it to retain relevant records until disposal of the same is approved by the Legal department.

7. The Company shall implement digital recordkeeping as far as possible.
8. All records subject to this Policy shall be identified appropriately while handing over for digital recordkeeping or while disposing.
9. Records maintained at the site shall be sent to the nearest regional office for preservation/ disposal as per this Policy.
10. Only authorized persons shall have access to the record room where the records are maintained.
11. In case of any conflict between this Policy and any law for the time being in force, the provisions of the relevant law regarding preservation, disposal of records shall prevail.

IMPLEMENTATION:

Each department shall designate one or more 'Custodian' for managing its records as per this Policy who will be responsible for identification, storage, retrieval and disposal of records.

DISPOSAL PROCEDURE:

- The Company will initiate the disposal process on a six monthly basis.
- The Company shall strive to dispose the records through pulping/ recycling to ensure eco-friendly disposal.

REVISION / AMENDMENT TO POLICY:

Any revision / amendment to the Policy shall be approved by the Board of Directors of the Company. However, any change in the retention period as mentioned in Annexure 1 due to changes in Act / Government Policy or for any other reason, can be approved by the Group CFO of the Company.

RECORD RETENTION SCHEDULE**I. ACCOUNTING & FINANCIAL RECORDS**

Document	Retention Period	Responsibility
Financial statements including Balance Sheet,	Permanent	Finance
Profit & Loss account and notes thereto	Permanent	Finance
Bank Reconciliations	Current Year + 8 Preceding Years	Finance
Payment Vouchers & Bank Statements	Current Year + 8 Preceding Years	Finance
Pay Roll records	Current Year + 8 Preceding Years	Finance
Books of original entry (Other Than General Journal & Sales Register)	Current Year + 8 Preceding Years	Finance
Cost Records & significant supporting data	Current Year + 8 Preceding Years	Finance
Credit/debit memos, sales invoices, warranty claims/ discounts given	Current Year + 8 Preceding Years	Finance
General Ledgers	Permanent	Finance
Expense reports	Current Year + 8 Preceding Years	Finance
Inventory & inventory tags	Current Year + 8 Preceding Years	Finance
Purchase/ Sales registers	Current Year + 8 Preceding Years	Finance
Trial Balances (General, Expense & Receivable Ledgers)	Current Year + 8 Preceding Years	Finance
Royalty payment records	Permanent	Finance

II. SECRETARIAL

Document	Retention Period	Responsibility
Annual Reports	Permanent	Secretarial
Audit Reports	Permanent	Secretarial
Minutes – Board of Directors Meetings and	Permanent	Secretarial
all Committee Meetings, AGM, EGM		
Records, Returns, Forms filed with ROC	8 years	Secretarial
Records, Returns, Forms filed with Stock Exchanges pursuant to Listing Agreement.	8 years	Secretarial
Documents filed with SEBI along with Certificates	8 years	Secretarial
Register of Members	Permanent	Secretarial

Annual Return under the Companies Act	Current Year + 8 preceding years	Secretarial
Memorandum & Articles of Association	Permanent	Secretarial
Copy of order confirming change of Regd. Office	Permanent	Secretarial
Approval for change in Memorandum and Articles of Association	Permanent	Secretarial
Prospectus	Permanent	Secretarial
Consolidation or division of share capital and conversion into stock	Permanent	Secretarial
Notice of increase in share capital	Permanent	Secretarial
Court order for reduction in share capital	Permanent	Secretarial
Court order regarding cancellation or variation of shareholders' rights.	Permanent	Secretarial
Notice of situation of registered office and any change therein	Permanent	Secretarial
List/ statement of unclaimed dividend.	5 years after transfer to IEPF	Secretarial
Address at which books of accounts are maintained	Permanent	Secretarial
Court/ tribunal order regarding compromise and arrangements with creditors / and arrangements with creditors /	Permanent	Secretarial
Transfer forms	Permanent	Secretarial
Demat request forms and status report	Permanent	Secretarial
General correspondence.	Current + 5 preceding years	Secretarial
Return of deposit filed under the Companies Act	5 years	Secretarial
Return of allotment of shares	8 years	Secretarial
Register of directors & KMPs	Permanent	Secretarial
Return of appointment of managerial personnel	5 years after cessation	Secretarial
Register of Investment	Permanent	Secretarial
Register of Buy Back of Securities	Permanent	Secretarial
Register of charges	Permanent	Secretarial
Register of renewed and duplicate share certificates issued.	Permanent	Secretarial
Register of Inter Corporate Loans / Advances	Permanent	Secretarial
Register of dividends	8 years	Secretarial
Register of directors attendance	8 years	Secretarial
Postal Ballot records	10 years	Secretarial
Register of Inspection	Permanent	Secretarial
Notices and Agenda of Meetings	5 years	Secretarial
Disclosures received under SEBI (Substantial Acquisition of shares and Takeovers)	8 years	Secretarial
Announcements uploaded on	8 years	Secretarial

company website as per Listing Agreement requirements		
Any other document not specified above	5 years.	Secretarial

III. LITIGATION & DISPUTES

Document	Retention Period	Responsibility
General Court Litigation (e.g., Civil / Criminal matters)	Final Resolution/ Settlement + 3 Years	Legal
Litigations relating to employees.	Current Employee: Term of employment or Resolution (whichever is later) + 3 Years; Former employee: Resolution + 3 Years	HR
Records relating to show cause notices, replies, adjudication orders, appeals, appellate orders etc. pertaining to different legislations viz. Income-tax, Sales tax, Central Excise, Customs Act etc.	Final resolution / settlement + 3 years	Respective Department Legal + respective departments
Legal opinions	Permanent	Legal
All records pertaining to Land	Permanent	Legal

IV. HUMAN RESOURCES

Document	Retention Period	Responsibility
Registers to be maintained under various Labour & Employment laws (except Provident Fund related records)	As prescribed by respective Act + 3 years	Human Resources
Returns filed under various Labour Laws	5 years from the date of filing	
Employee Provident Fund/ Pension related records including contribution details, nomination, payment of administrative charges etc.	Permanent	Human Resources
Employee personal file (containing all employee related communication issued to employee/ internal, forms, appraisals, Promotions. recognitions, rewards, warnings, investigations etc.)	5 years after retirement.	Human Resources
Wage agreements	Permanent	Human Resources

V. ENVIRONMENTAL

Document	Retention Period	Responsibility
Incident reports and corrective action	Corrective action completion + 3 years	Finance/Accounts
Test Reports of Water, Air, Effluents etc.	Current year + 5 years	Finance/Accounts
Consent Applications and Consents from Pollution Control Boards	Permanent	Finance/Accounts
Material Safety data sheets	Permanent	Finance/Accounts
Environmental Assessment Reports	Permanent	Finance/Accounts
Regulated waste manifests and associated documentation (e.g., analytical data)	Current year + 5 Years	Finance/Accounts

VI. TAX RECORDS

Document	Retention Period	Responsibility
Tax-Exemption documents	Permanent	Finance/Accounts
Central Excise & service tax records	Assessment completion + 5 years	Finance/Accounts
Tax returns – income tax	Permanent	Finance/Accounts
Sales tax/ VAT records (returns, audit reports, assessment orders, appeal orders etc.)	Assessment completion + 10 years	Finance/Accounts
CST/ VAT Forms (C, I, E1, E2, H, F etc.)	Current year + 5 years	Finance/Accounts
Export Documents ARE-1	Current year + 5 years	Finance/Accounts
Bonds, Undertakings	Permanent	Finance/Accounts
Correspondence with excise authorities	Current year + 5 years	Finance/Accounts
Cenvat credit invoices	Current year + 5 years	Finance/Accounts
Cenvat Input Accounts & Capital Goods Account	Current year + 5 years	Finance/Accounts

VII. INSURANCE

Document	Retention Period	Responsibility
Insurance Claims	5 Years After Settlement	Finance/Accounts
Insurance Policies	Current + 8 years	Finance/Accounts
Public Liability Insurance policy	15 years	Finance/Accounts
Correspondence	5 Years	Finance/Accounts