

PRESERVATION OF DOCUMENTS
POLICY
OF
WELKIN COMMERCIALS
PRIVATE LIMITED

INDEX

SR. NO.	PARTICULARS
1.	Background
2.	Definitions
3.	Coverage
4.	Classification
5	Mode of preservation
6	Custody of documents
7	Authority to make alterations to the Policy
8	Destruction of documents
9	Conversion of the form in which the documents are preserved
10	Authenticity

1. BACKGROUND

WELKIN COMMERCIALS PRIVATE LIMITED (henceforth referred to as "**Company**" or "**Welkin**") handles a variety of data and documents defined under clause 2 as part of its operations. These include physical documents and digital documents and data ("**documents**").

A policy on the preservation of documents provides the framework for the establishment of relevance and retention periods for documents, and the framework for ensuring safe-keeping, protection, traceability, retrievability, and accessibility of documents.

The Company, makes board approved policy inter alia, in pursuance of Master direction (Know Your Customer (KYC) Directions, 2016, Prevention of Money-Laundering Act, 2002, and Prevention of Money-Laundering (Maintenance of Records) Rules, 2005 on the preservation of the documents to aid the Company in handling the documents efficiently. It not only covers the various aspects of preservation of the documents, but also their safe disposal/destruction.

2. DEFINITIONS

2.1 "**Act**" means the Companies Act, 2013.

2.2 "**Applicable Law**" means any law, rules, circulars, guidelines or standards under which the preservation of the documents has been prescribed.

2.3 "**Authorised Person**" means any person duly authorised by the Board, Managing Director, Whole Time Director, General Manager or any other competent person of the Company holding appropriate delegation by the aforesaid person and who is entrusted with the responsibility of maintenance and preservation of documents.

2.4 "**Compliance Officer**" means the person appointed by the Board as the Compliance Officer.

2.5 "**Authority**" means any statutory, administrative, arbitral and/ or judicial Authority.

2.6 "**Board**" means the Board of directors of the Company.

2.7 "**Company**" means **WELKIN COMMERCIALS PRIVATE LIMITED** henceforth referred to as "**Company**", "**Welkin**")

2.8 **“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.

2.9 **Document(s)** refers to documents, KYC’s, writings, papers, notes, agreements, deeds, contracts, summons, notices, advertisements, requisitions, orders, declarations, forms, correspondence with Authorities or in pursuance of applicable laws, minutes, indices, registers and or any other record/s, required under or in order to comply with the requirements of any Applicable Law, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper / print form or in Electronic Form and does not include multiple or identical copies.

2.10 **“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.

2.11 **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact 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 access to it.

2.12 **“Maintenance”** means custody of documents in physical or electronic form.

2.13 **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.

The words and phrases used in this Policy and not defined here shall derive their meaning from the Applicable Law.

3. **OBJECTIVE**

This Policy is intended to guide the Company and its officers on the maintenance of any documents, their preservation, and disposal.

4. **CLASSIFICATION**

The preservation of documents should be done in the following manner:

a) Where there is a period for which a document is required to preserve as per Applicable Law, for the period required by Applicable Law.

b) Where there is no such requirement as per Applicable Law, then for such period as the document pertains to a matter which is “Current”.

c) 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 a document may be preserved for a period of 8 financial years from the date on which the document was originated.

5. MODES OF PRESERVATION

- A. The documents should be preserved in
- Physical form
 - Electronic Form or
 - Any other form that might be required under any law
- B. Storage and preservation of documents must allow for care, control, safekeeping and preservation of documents, ensuring that they are
- Protected, secure and accessible for as long as required;
 - Adequately stored to prevent physical damage and/or loss
 - Stored in conditions that ensure long-term preservation of the document for as long as required and
 - Protected from unauthorized access, alteration, and deletion
- C. 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.
- D. The preserved documents must be accessible at all reasonable times. Access shall be controlled by an Authorized Person who would ensure the integrity of the documents and prohibit unauthorized access.
- E. Determination of mode of storage, where documents are available in physical and electronic form, should be made in consultation with internal legal counsel and the Compliance Officer.
- F. The Roles and Responsibilities of various functions under the Policy should be as follows:
- The Head of the respective department should be responsible for establishing the list of documents to be preserved, the form of storage, and the period of storage as per the Applicable Law. The Authorised Person, responsible for storage and safe-keeping of the documents also should be designated by the respective department heads.

- Compliance and Legal functions should be responsible for reviewing and certifying retention standards for each function.
- The Authorised Persons should be responsible for the storage and safe-keeping of the documents as per the retention standards prescribed under 5. B.
- Internal Audit and Operational Risk Management should be responsible for confirming the controls.

6. CUSTODY OF THE DOCUMENTS

The custody of the documents related to a function/department should be with the respective Authorised Person of the department/function. As and when the Authorised Person tenders resignation or is transferred from one location of the Company to another, the respective departments head should ensure that another person is authorised and such person takes over all the relevant documents, in his possession from the person relinquishing his/her charge.

7. AUTHORITY FOR MAKING MODIFICATIONS TO THE POLICY

The Board is authorised to make such alterations to this Policy as considered the appropriate, subject, however, to the condition that such alterations shall be in consonance with the provisions of the Acts and Regulations.

8. DESTRUCTION OF DOCUMENTS

- A. Destruction as a normal administrative practice should occur for the records that are duplicated, unimportant, or for short-term use only. This applies to both Physical and Electronic documents.
- B. The temporary documents, excluding the Current document(s) should be destroyed after the relevant or prescribed period, by the Authorised Person in whose custody the documents are stored as per the approved retention standard. The documents for which special requests are made should be retained till destruction is specifically authorised by respective department heads.
- C. A register of the documents disposed of/destroyed should be maintained. It should state the brief particulars of the documents destroyed, date of board/other approvals, date of disposal/destruction, and the mode of destruction.

9. CONVERSION OF THE FORM IN WHICH THE DOCUMENTS ARE PRESERVED.

The physical documents preserved should be converted, whenever required or felt necessary, into electronic form and efficient utilization of space subject to compliance of the Applicable laws.

10. AUTHENTICITY

Where a document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.
