



AUTOMOTIVE AXLES LIMITED

POLICY ON DOCUMENT RETENTION

1. OBJECTIVE:

This policy has been prepared to provide the Retention of physical and electronic documents of the Automotive Axles Limited and archival of the documents at the website. This policy is prepared in compliance with Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015. The objectives of this policy are as follows:

- 1.1 To guide the employees on identification, categorisation of the documents into permanent and non-permanent documents
- 1.2 To detail out the duration of retention of the non-permanent documents
- 1.3 To provide the procedure for destruction of the documents

2. CLASSIFICATION OF DOCUMENTS TO BE PRESERVED:

The Company's physical and electronics document shall be classified as follows:

- 2.1 Documents that need to be preserved / retained permanently-Category 1
- 2.2 Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR- Category 2
- 2.3 Documents like budget papers, bank guarantees etc., which may be retained for less than 8 years - Category 3

3. SUSPENSION OF RECORD DISPOSAL IN THE EVENT OF LITIGATION OR CLAIMS:

3.1 In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit or commencement of any litigation against the Company, the Company and its employees shall ensure that any destruction of the concerned documents shall be suspended till the process of litigation/ investigation is completed.



4. PRINCIPLE OF RESPONSIBILITY OF EMPLOYEES FOR PRESERVATION OF DOCUMENTS:

4.1 All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

5. STATUTORY REQUIREMENTS:

5.1 If as per any other law of land including Information Technology Act, a physical or electronic record should be preserved for a longer period than what has been stipulated in this policy, then the document shall be preserved as per the applicable statutory stipulations.

6. DESTRUCTION OF DOCUMENTS:

6.1 The documents which are mentioned in Category 2 shall be destroyed after the completion of 8 years after obtaining the approval from the President and CFO and Company Secretary.

6.2 The documents which are mentioned in Category 3 shall be destroyed after the completion of relevant period after obtaining the approval from CFO and Company Secretary.

6.3 The request for destruction shall be signed by the Head of the Department

6.4 The presence of the Head of the Department is necessary at the time of destruction of documents.

7. PERIODICAL REVIEW OF THE POLICY BY TOP MANAGEMENT:

The Policy should be flexible and easy to understand and comply with by all levels of employees. The policy should be reviewed periodically by the Top Management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered.



ANNEXURE

A. DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE (Category 1):

1. Accounting and Finance records including Annual Financial statements and Audit Reports;
2. Investment records;
3. Tax records including annual IT returns;
4. Property records including purchase and sale deeds, licences, copyrights, patents & trademarks;
5. Corporate Records including Certificate of Incorporation, Common Seal, Minutes of Board, Committee and Shareholders' Meetings, Register of Members and other Statutory Records;
6. Personal files of individual employees (Payroll Records, Employee deduction authorisations, attendance records, employee medical records, leave records, Pension and retirement related Records, etc);
7. Filings with Registrar of Companies
8. Any other record as may be decided by any KMP (as per Companies Act 2013) or the Managing Director or the Board of Directors of the Company from time to time;

B. DOCUMENTS WHOSE PRESERVATION PERIOD SHALL NOT BE LESS THAN EIGHT YEARS AFTER COMPLETION OF THE RELEVANT TRANSACTIONS (Category 2):

1. Bank Statements and vouchers;
2. Filings with Stock Exchanges and other statutory authorities;
3. Corporate Social Responsibility Records;
4. Sponsorship Projects Records;
5. Correspondence and Internal Memoranda;
6. Tender Documents;
8. Lease Deeds and Contracts;
9. Legal files;
10. Insurance Records including policies and claims;
11. All e-mail correspondence, internal & external;
12. Any other record as may be decided by the Managing Director of the Company from time to time.

C. DOCUMENTS WHICH MAY BE PRESERVED FOR A PERIOD LESS THAN 8 YEARS:

1. Annual Plans and budget- 3 years after the budget is closed
2. Security Deposit Receipts - 3 years after the termination of the contract



3. Bank Guarantees- Till the expiry of the claim period
4. Employee Deduction Authorization- 3 years after deduction
5. Leave Records- 2 years after the relevant period
6. Employee Medical Records- 3 years after termination of service of employment
7. Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers- 3 years after termination of service of employment

Date: May 18, 2017
Place: Pune

For Automotive Axles Limited

Dr. B N Klayani
Chairman

