

ROLTA POLICY FOR PRESERVATION OF DOCUMENTS

The corporate records of Rolta India Limited (hereafter the “Company”) are important assets. Corporate records include essentially all records produced by an employee, whether paper or electronic. A record may be as obvious as a memorandum, an e-mail, a contract or a case study, or other records produced in the course of business or dealings.

The law requires the Company to maintain certain type of corporate records, usually for a specific period of time. Failure to retain those records for those minimum periods could subject employee and the Company to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, or seriously disadvantage the Company in litigation.

The Company expects all employees to fully comply with “**Rolta Policy for Preservation of Documents**” (Policy).

From time to time the Company establishes retention or destruction policies or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property and cost management. Several categories of documents that bear 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 identified above, as well as any other pertinent factors.

(A) Documents to be preserved in Perpetuity

Type of Record	Description
Board / Committee Minutes	Minutes of the meeting of Board of Directors and its Committee.
(i) Press Releases / Public Filings	Copies of all press releases and publicly filed documents under the theory that the Company should have its own copy to test the accuracy of any documents a member of the public can theoretically produce against that Company.

(ii) Registers and other documents under Companies Act, 2013	Registers and other documents as specified in the Companies Act, 2013 or any amendments made to them from time to time.
	Register of Charges
	Register of Investment in Securities not held in the Name of the Company
	Register of Index of members
	Register of renewed and duplicate certificates
	Register of contracts in which directors are interested
	Register of Directors, Managing Director, Manager and Secretary
	Register of documents executed under common seal

(B) Documents with specified Retention period

Type of Record	Description	Period of Retention
(a) Board / Committee Meeting records	A clean copy of all materials of Board / Committee should be maintained.	Eight years
(b) Tax Records	Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, bank statements, business costs, accounting procedures and other documents concerning the Company's revenues.	Eight Accounting years immediately preceding the current Accounting Year
(c) Marketing and Sales Documents	The Company should keep final copies of marketing and sales documents, sales invoices, lease, license etc.	Three years beyond the life of the agreement or 8 years maximum.
(d) Development / Intellectual Property and Trade Secrets	Copy Right / Patents / documentation of Software / IP to be maintained	Till life of IP / Software or till it appears in the asset register of the Company, whichever is later.

Type of Record	Description	Period of Retention
(e) Contracts / Agreements	Final, execution copies of all contracts entered into by the Company should be retained.	Eight years from the date of contract / agreement or three years beyond the life of last transaction in the contract / agreement whichever is later.
(f) Electronic Mail	E-mail that needs to be saved should be either : i. Printed in hard copy and kept in the appropriate file ; or ii. Downloaded to a compute file and kept electronically or on disk as a separate file	The retention period up to 3 years after the subject matter or applicability of Law of limitation whichever is later.
(g) Employee records	Employee Personal Records, Contracts, Service Records	Three years after the cessation of employment except for IP related records which shall be retained as per point No. B(d) above
(h) Registers and other documents under Companies Act, 2013	The Company shall maintain following registers and other documents as specified in the Companies Act, 2013 or any amendments made to them from time to time.	
	Register of Postal Ballot	8 years
	Register and Index of Debenture Holder	8 years
	Foreign Register of Members or Debenture holders	8 years

Type of Record	Description	Period of Retention
	Register of Employee Stock Options	8 years
	Forms/Register in respect of SEBI (Prohibition of Insider Trading) Regulations 2015	8 years
	Annual Return	8 years
	Register of Deposits	8 years
	Register of allotment	8 years
	Register of payment of dividend	8 years
	Register of Directors attendance	8 years
	Register of Proxies	8 years
	Register of Inspection	8 years
	Register of investor complaints	8 years
	Register of Sweat Equity Shares	8 years
	Books of Accounts	8 accounting years immediately preceding the current accounting year
	Register of Buy Back of Securities	Minimum 8 years
	Directors should give notice of securities of the Company held acquired or disposed of by them	8 years
	Every Company should from the date of its registration maintain one or more registers of inter corporate loans and investments in securities and enter therein the particulars of every investment or loan made, guarantee given or security provided by the Company relation to any Body Corporate	8 years after expiry of investment
	Register of Investments (other than securities not held in the name of the Company)	8 years after expiry of investment
	All IPO records / Rights / Follow on FPO etc.	8 years after the event.
	Register of transfer of shares	8 years
	Register of Transmission of shares	8 years
	Register of Transfer of Debentures	8 years
	Register of Transmission of Debentures	8 years
	Register in respect of SEBI Regulations 1997	8 years

All the records / documents referred above from (A) and (B) may be kept in electronic mode.