

BETEX INDIA LIMITED

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POLICY ON PRESERVATION OF DOCUMENTS

&

ARCHIVAL OF DOCUMENTS IN THE WEBSITE

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POLICY ON PRESERVATION OF DOCUMENTS

(Under Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

1. PREAMBLE:

The Board of Directors (the "Board") of Betex India Limited (the "Company") has adopted the following policy with regard to preservation of Documents. This Policy has been formulated in accordance with Regulation 9 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. This Policy shall be known as "Policy on Preservation of Documents and Archival of Documents in the Website".

2. OBJECTIVE

The purpose of this Policy is to specify the type of document(s) and time period for preservation thereof based on the classification mentioned under the Regulation 9 of the Listing Regulations, 2015.

3. PURPOSE:

The purpose of the policy is to facilitate the following:

- i. Identification of records that are to be maintained permanently or for any other shorter period of time.
- ii. Deciding the mode of preservation of documents, whether in physical form or in electronic form.
- iii. Retention of records for the periods required by applicable laws and regulations and for other business reasons for a period of time that will reasonably assure their availability when needed.
- iv. Preservation of the confidentiality and security of records/data.
- v. Systematic and non-selective temperament of records not necessary for legal or business reasons.

4. DEFINITIONS:

- i. "**Act**" means the Companies Act, 2013.
- ii. "**Applicable Law**" means any law, rules, circulars, guidelines or regulations issued by the Securities and Exchange Board of India (SEBI) and Ministry of Corporate Affairs (MCA).
- iii. "**Board of Directors**" or "**Board**" shall mean the Board of Directors of the Company, as constituted from time to time.
- iv. "**Books of Accounts**" as defined in Section 2(13) of the Act.
- v. "**Company**" shall mean Amber Enterprises India Limited.
- vi. "**Documents**" refers to papers, records, files, tapes, notes, agreements, notices, agenda, circulars, advertisements, declarations, forms, minutes, registers, correspondences challans,

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CDs, DVDs, electronic storage devices, audio/video recordings or any other record 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 or in Electronic Form.

- vii. **“Electronic Form”** means any electronic device such as servers, computer, laptop, compact disc, pen drive, 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.
- viii. **“Maintenance”** means keeping documents, either physically or in Electronic Form.
- ix. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed.
- x. **“SEBI Listing Regulations”** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

Any term, word and phrases not defined herein shall have the same meaning as defined in the Companies Act, 2013, Regulations or any other applicable law or regulation to the extent applicable to the Company.

This policy sets the standards for managing, storing and preservation of documents of the Company broadly classified in the following two categories:

- i. Category (A): The documents of permanent nature (listed in Annexure 1) shall be maintained and preserved permanently by the Company subject to the modifications, amendments, addition, deletion, or any changes made therein from time to time Provided that all such modifications, amendments, additions or deletion in the documents shall also be preserved permanently by the Company.
- ii. Category (B): The documents of the company to be maintained and preserved for specified time period after completion of the relevant transactions (listed in Annexure 2) shall be preserved by the company for a term not less than eight years after completion of the relevant transactions subject to the modifications, amendments, addition, deletion or any changes made therein from time to time.

Provided that all such modifications, amendments, additions or deletions in the documents shall also be preserved for a term not less than eight years.

5. MODES OF PRESERVATION OF THE DOCUMENTS

- i. The documents may be preserved in physical form or electronic form
- ii. The officer of the Company required to preserve the documents shall be Authorised Person who is generally expected to observe the compliance of requirements of Applicable Law.
- iii. 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
- iv. The preserved documents must be accessible at all reasonable times. Access may be controlled by Authorised person, so as to ensure integrity of the Documents and prohibit unauthorized access.

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- v. Physical preservations shall be ensured in proper store / record rooms, access to which shall be allowed to only persons authorized.

This Policy is in conjunction with any extant policy of the corporation in the matter of Preservation of Documents / Records Retention and also subject to the provisions of other laws viz., Right to Information Act, 2005, The Public Records Act, 1993 etc., as applicable. For the purpose of RTI Act, all the documents shall be retained for a minimum period of 20 years.

6. DISPOSAL/DESTRUCTION OF DOCUMENTS

The temporary documents as listed in Category (B), excluding the current Documents shall be destroyed after the relevant or the prescribed period, by the Authorised Person in whose custody the Documents are stored, after the prior approval of the Board or any other authority as required under Applicable Laws pursuant to which the Documents have been preserved.

7. STATUTORY REQUIREMENTS

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.

8. ROLES AND RESPONSIBILITY

The respective Departmental Heads of the Company shall be responsible for maintenance and preservation of documents in terms of this policy which shall be reported annually to the Audit Committee for its review.

9. POLICY REVIEW

This Policy is framed based on the requirements of Regulation 9 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 and Companies Act, 2013. The Board of Directors may subject to applicable laws amend/substitute any provision(s) with a new provision(s) or replace this Policy entirely with a new policy.

If any subsequent changes in the Companies Act or the SEBI Listing Regulations are inconsistent with any part of this Policy, the provisions of the Companies Act 2013 or the SEBI Listing Regulations, as the case may be, shall prevail over the Policy and the provisions in the Policy shall be modified to make it consistent with such applicable law.

Any change in the policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and/or amend any part of this policy or the entire policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

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ARCHIVAL POLICY

(Under Regulation 30(8) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

1. BACKGROUND

Regulation 30(8) of the SEBI Listing Regulations requires every listed entity to make available an archival policy on its website. In this context, the following policy has been framed by the Board of Directors of the Company.

2. OBJECTIVES

Pursuant to Regulation 30(8) of the SEBI Listing Regulations, records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual, legal or regulatory requirements or for other purposes as may be set forth below. Records that are no longer required, or have satisfied their required periods of retention, shall be destroyed as per the procedure prescribed under law.

3. SCOPE

In line with the Company's Policy on Determination of Materiality of Events and as per the SEBI Listing Regulations, the Company shall disclose all such events to the Stock Exchanges and such disclosures shall be hosted on the website of the Company for a period of 5 years and thereafter the same shall be archived so as to be available for retrieval for a further period of three years by storing the same on suitable media. Thereafter the said information, documents, records may be destroyed as per the policy on preservation of documents.

4. POLICY REVIEW

The Policy shall be subject to review by the Board. Any amendment made to the policy as deemed necessary from time to time in accordance with the regulatory requirements / amendments or otherwise, shall be reported to the Board for approval and noting at a meeting of the Board.

ANNEXURE 1**DOCUMENTS WHOSE PRESERVATION SHALL BE PERMANENT IN NATURE IN THE ARCHIVES OF THE COMPANY****1. Corporate Records**

- Common Seal
- Registration Certificate
- Constitutional documents i.e. Memorandum and Articles of Association of the Company
- Affidavit from the subscribers to the memorandum and from person named as the first directors
- Minutes Books of Board, General Meetings and Committees Meetings
- Statutory Registers
- License and Permissions
- Statutory Forms except for routine compliance
- Scrutinizers Report
- Register of Member
- Index of Members
- Audited Financial Statements
- Documents related to purchase of shares/investments in an entity
- Books and documents relating to issue of share certificate, including blank forms of share certificates

2. Accounts and Finance

- Annual Audit Reports and Financial Statements
- Subsidiary's Account
- Internal/Cost audit Reports
- Compliance/Secretarial Audit Report

3. Tax Records

- Tax Exemption and Related documents
- Tax Bills, receipts and payments

4. Legal Files and Records

- Court Orders
- Business / JV/SPA/Loan/Lease Agreements
- Trade Mark /Copy Rights/Patents

5. Property Records

- Original Purchase and Sale Agreement
- Property Card, Index II, Ownership records issued by Government Authority
- Property Insurance

6. Projects

- Project Documents and Related correspondence (including any proposal of the Project and its approval)
- The documents containing the terms and conditions regarding operation and management of manufacturing units

7. Correspondence and Internal Memo

- Those pertaining to non-routine matters or having significant lasting consequences

8. Insurance Records

- All Insurance Policies

9. Personnel Records

- Payroll Registers
- Bonus, Gratuity and other Statutory Records

10. Agreement

- Material Agreements/Contracts

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ANNEXURE – 2

DOCUMENTS WITH PRESERVATION PERIOD OF NOT LESS THAN THREE YEARS, EIGHT YEARS OR MORE AFTER COMPLETION OF RELEVANT TRANSACTION AND MISCELLANEOUS:

1. Corporate Records

- Annual Returns and other Forms filed with MCA
- Board Agenda and supporting documents
- Attendance Register
- Office copies of Notice of General Meeting and related papers
- Office copies of Notice of Board Meeting / Committee Meeting, Agenda, Notes on Agenda and other related papers
- All notices pertaining to disclosure of interest of directors
- Films, Audio, Video, CDs, DVDs, etc
- Correspondence with Department/Shareholders
- Certificates surrendered to a Company
- Instrument creating a charge or modification
- Any other documents which have been so decided to be preserved by the Function/Department Heads, either under their own respective judgments or as required to be preserved by any specific Law
- Miscellaneous – Register of Debenture-holders, if any (15 years after the redemption of debentures)
- Miscellaneous – Index of debenture-holders, if any (15 years after the redemption of debentures)

2. Accounts and Finance

- Annual Plans and Budgets
- Books of Accounts, Ledgers and Vouchers
- Sales Invoice & Purchase Invoice
- Bank Statements
- Investment Records
- RBI Returns
- Foreign Trade documents
- Miscellaneous – General Correspondence (3 Years)

3. Tax Records

- Excise/Customs Records
- Tax Deducted at Source Records
- Income Tax papers
- Goods & Services Tax GSTpapers
- Above records needs to be maintained from 8 years from the end of the Financial Year or completion of assessment under the applicable law is over whichever is later.

4. Legal Files and Records

- Contracts, Agreements and Related correspondence (including any proposal that resulted in the contract and other supportive documentation)
- Miscellaneous – Legal Memoranda and Opinions including subject matter files (3 years after the close of the matter)
- Miscellaneous – Litigation files

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5. Correspondence and Internal Memo

- Correspondence and memoranda pertaining to routine matters and having no significant impact, lasting consequences e.g. Routine letters, notes that require no acknowledgement or follow-up, such as inter office memo, letters for transmittal and plans for Meetings;
- Letters of general enquiry and replies that complete the cycle of correspondence; (3 Years)

6. Insurance Records

- Journal Entry support data
- Inspection Reports
- Miscellaneous
- Claims records (Till settlement is over and claim money is received)
- Group Insurance Plans (Until plan is amended or Terminated)

7. Personnel Records

- Time office Records and Leave Cards
- Unclaimed Wages Records
- Employees Information Records
- Statutory Returns /Reports
- Miscellaneous – Employees Medical Record (3 years after separation)

8. Electronic Records

• Electronic Mail

All e-mails received from Internal and External Sources may be deleted after 8 years.

- Employees will strive to keep their e-mails related to business issues.
- All Emails related to business issues should be downloaded to a server or user directory on server.
- Employees are requested to take care not to send proprietary or confidential internal e-mails to outside sources.
- All e-mails of Employees which are important should be copied to the employees' folder.

• Web Page Files : Internet cookies

All workstations Internet Explorer should be scheduled to delete Internet cookies once per month.

- The Company does not automatically delete electronic files beyond the date specified in the Policy. It is the responsibility of all Employees to adhere to the guidelines specified in this Policy. Each month the Company will run backup copy of all Electronic files including email on servers. This backup is safeguard to retrieve lost information within 1 year retrieval period should the documents on network experience problems. The backup copy is considered a safeguard for the record retention system of the Company.
