



ROSSELL INDIA LIMITED

ROSSELL POLICY ON PRESERVATION OF DOCUMENTS

[Pursuant to Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.]

1. PREAMBLE

The Securities and Exchange Board of India (SEBI), on September 2, 2015, has notified the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Listing Regulations). Pursuant to Regulation 9 of the said Listing Regulations, every listed Company shall frame and adopt a policy on preservation of documents.

Accordingly, the '*Rossell Policy on Preservation of Documents*' has been approved and adopted by the Board of Directors of Rossell India Limited ("the Company") at its meeting held on 10th February, 2016.

2. PURPOSE AND APPLICABILITY

This policy intends to Integrate, Standardize and Harmonize the manner of preservation and destruction of documents pursuant to Regulation 9 of the SEBI Listing Regulations in the following categories:

- a) Documents whose preservation shall be permanent in nature;
- b) Documents with preservation period of not less than eight financial years after completion of relevant transactions;
- c) Documents with preservation period of not less than five financial years after completion of relevant transactions and
- d) Documents with preservation period of not less than three financial years after completion of relevant transactions.

This policy further intends to cover possible indicative list of business documents of the Company, including written, printed and recorded matter, whether in paper or electronic forms of records. The Chief Financial Officer-cum-Company Secretary/Compliance Officer would be responsible for overseeing the implementation of the Policy.

This Policy shall be deemed to be applicable to the Company effective 1st December, 2015.

3. DEFINITIONS

- a) Compliance Officer: "Compliance Officer" means the Company Secretary of the Company, who is responsible to perform various duties as required under section 205 of the Companies Act 2013 as well as Regulation 6 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

- b) Document: "Document" means all business records of the Company in written or printed manner and recorded matter, whether in paper or electronic forms, of records maintained in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, and includes summons, notices, requisitions, orders, declarations, forms and registers, whether issued, sent or kept in pursuance of any applicable law for the time being in force or otherwise, maintained on paper or in electronic form;

4. GOVERNING LAWS

This policy shall be governed by the Companies Act 2013, SEBI Act, 1992, Rules and Regulations framed thereunder, Accounting standards, Secretarial Standards, Tax Laws, Labour Laws and all other applicable laws for the time being in force.

5. CLASSIFICATION OF DOCUMENTS

Documents shall be classified in the following two categories:-

- a) **Mandatory under governing laws:** Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum maintenance timeline is stipulated under any of the laws shall be preserved in accordance with this policy.
- b) **Non-Mandatory:** All records and documents as provided herein shall be preserved for such time and period as may be provided herein. Any change in the governing laws affecting the change in period of preservation of documents shall prevail over this policy.

6. PRESERVATION OF DOCUMENTS/RECORDS

In terms of Clause 4 above, the following indicative categories of documents are to be preserved in the manner specified below:

- a. Tax and Accounting Records:** All records related to Accounts and Tax (Direct and Indirect), including Books of Accounts, Financial Statement, Audit Report etc. should be retained for at least eight financial years or such period of time as prescribed under respective laws for time being in force, whichever is later from the date of filing the applicable return.
- b. Employment Records/Personnel Records:** All records related to employees of the Company including personnel files etc. shall be maintained for employees as long as the concerned individual remains an employee of the Company and also for a minimum period of 3 financial years thereafter or such period of time as prescribed under respective laws for time being in force whichever is later.

Returns under various labor laws, governmental and statutory filings etc. need to be retained in accordance with the related statute as may be specified therein or for a minimum period of 8 financial years whichever may be later.

- c. Minutes/Statutory Registers and other Secretarial documents:** Minutes of Meetings of Board, Members and other Committee Meeting along with Statutory Registers and various documents filed as prescribed under the Companies Act, 2013 and SEBI Act, 1992 shall be preserved permanently. Any other document where preservation period is not prescribed under governing laws shall be preserved for a minimum period of eight financial years.
- d. Press Releases/Public Filings:** The Company should retain copies of all press releases and documents filed with Stock Exchanges, Registrar of Companies and other regulatory authorities for a period of 8 financial years.
- e. Website Disclosures:** All Statements, Certificates, Reports and other documents which have been submitted by the Company to the Stock Exchanges under various provisions of the SEBI (Listing obligation and Disclosure Requirements) Regulations, 2015 shall be available on the Website of the Company at www.rossellindia.com for a period of 5 financial years from the date of its disclosure and shall thereafter be archived from the website of the Company for a further period of 3 financial years.
- f. Legal Files / documents:** All legal documents / copies of notices / summons / orders / judgments and any other documents shall be preserved for 8 financial years from the conclusion of the proceedings. Documents like leases, Leave & License agreements and other agreements shall be preserved for at least 8 financial years beyond the life of the said documents.
- g. Contracts/ other relevant documents:** Final executed copies of all contracts/ other Company related documents entered into by the Company, which are permanent in nature, shall be retained permanently. The Company shall retain copies of the final contracts for at least 8 financial years beyond the life of the agreement.
- h. Other Documents:** All other documents, not included in the above categories, and non-mandatory in nature shall be retained for 3 financial years or up to such period as may be specified by the person, not exceeding 8 financial years, authorized in the manner as per clause 6 below.

7. CUSTODY OF DOCUMENTS

All documents shall be under the custody of respective functional heads under the supervision of respective Divisional Heads as detailed below:

Sl. No.	Documents	Authorised Person
1	Financial Statements / Accounting Records /Tax	Chief Financial Officer-cum-Company Secretary/ Divisional Finance Head
2	Minute Books , Statutory Registers and records	Chief Financial Officer-cum-Company Secretary
3	Employment / personal records	Head of HR and

		Administration of respective Divisions
4	Legal Documents and Intellectual Property and Trade Secrets	Chief Financial Officer-cum-Company Secretary/ Divisional Heads
5	Documents related to Marketing and Sales	Heads of Marketing of respective Divisions
6	Documents related to Production/Operation etc.	Heads of Production/Operation of respective Divisions
7	Information Technology/Server documents	Head of Information Technology

The Executive Chairman of the Company is authorized to change the authorized persons at any time.

8. DESTRUCTION OF DOCUMENTS

The preserved documents as mentioned in the policy may be destroyed, after the prescribed retention period as per this Policy, under the supervision of the Divisional Head of the concerned Division after taking approval from the Compliance Officer of the Company. Before destruction, the Head of concerned shall prepare a list of documents to be destroyed and share the same with the Compliance Officer of the Company. The destruction of documents may be delayed or prevented if the situation so requires.

9. AMENDMENTS

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.
