

Documents Preservation Policy of Voith Paper Fabrics India Limited

Preamble

This Policy for Preservation of Documents of the Company has been prepared in pursuance of Regulation 9 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (here-in-after referred to as 'Listing Regulations').

Purpose

The Policy is intended to ensure that documents in the Company are handled properly and associated risk of loss of information or documents is reduced. This policy formalizes the Company's protocol for saving, retaining and discarding the documents received or created within the Company during the ordinary course of business. The Policy may aid the Company in litigations or otherwise required by the management. This Policy also intends to reduce the time devoted to search and/or retrieve the desired information/document as & when needed.

Policy

1. Documents to be preserved would be classified in two categories – Permanent and Not Less than 8 years.

1.1 Illustrative List of Documents to be preserved permanently:

- Register of contracts with related party and contracts and bodies in which Directors are interested.
- Register of members including an index of names.
- Minute Books of General Meetings.
- Minute Books of Meetings of the Board and its Committees.
- Register of renewed and duplicate share certificates.
- Prospectus and/or Offer Documents and their supporting documents.
- Investors' Complaint Documents.
- Shareholding Patterns.
- All documents pertaining to transfer & transmission of securities, issue of securities and those specified under Listing Regulations, 2015
- Listing Agreement entered with Stock Exchanges.
- Such other documents as may be mentioned in the Companies Act, 2013 and/or as may be specified by the Board of Directors or its duly authorized person in this regard, from time to time.

1.2 Documents to be preserved for a period of not less than 8 years:

- Books of accounts together with relevant supporting vouchers.
- Disclosures/notices by a Director of his interest.
- Annual Return and copies of all certificates and documents required to be annexed thereto.
- Documents pertaining to pending assessment proceedings under direct/indirect taxation or any other law would be preserved beyond 8 years, if needed, until the assessment or litigation on such assessment, if subsisting, under the relevant legislation is completed, finalized and concluded.

- Such other documents as may be mentioned in the Companies Act, 2013, Secretarial Standards and/or as may be specified by the Board of Directors or its duly authorized person in this regard, from time to time.

2. Mode of preservation

All Documents required to be preserved by the company under any applicable legislation shall be preserved either physically or in electronic form as may be decided by the respective functional in-charge in each department of company.

3. Prevention of documents from misuse, loss, tampering, unauthorized access, etc.

Following measures must be taken for prevention of documents/information from possible misuse, loss, tampering, etc.:

1. Each 'Head of the Department (HoD)' to take adequate measures regarding collection, use, disclosure & provision of access to information/documents pertaining to their respective department.
2. Login Access to computers must be password protected.
3. Digital Signature of appropriate authority is used to prevent tampering of documents of confidential nature.

4. Safe keeping and integrity

It must be ensured that company takes following suitable steps for safe keeping and maintaining the integrity of documents/information:

1. Procedures have been established to ensure that staff appropriately handles information and documents, both physically and electronically.
2. Reasonable steps are taken by the officials to re-examine the policy from time to time and all necessary adjustments are made on regular basis.
3. The company has established clear procedures and lines of authority regarding access to such documents and their retrieval.
4. Appropriate measures are taken by the company in respect to network security, ensuring data back-up and its integrity, etc.
5. All Important physical documents as may be decided by the management from time-to-time and electronic back-ups are preserved in fire proof lockers/cabinets.

5. Disposal of documents

After the expiry of stipulated period, the concerned documents may be disposed-off in accordance with the applicable provisions of the Companies Act, 2013 in this regard, as amended from time-to-time.

6. Persons responsible

All acts relating to the preservation of Documents and maintaining the integrity of this Policy shall be the responsibility of concerned officer heading the various departments of the company.

The Board shall always have the right to amend this Policy at any point of time, whenever it deems necessary to do so.