

SPOTBOY TRACOM PRIVATE LIMITED

CIN: U51909WB1995PTC068183

REGISTERED OFFICE: DUNCAN HOUSE, 31, NETAJI SUBHAS ROAD KOLKATA-700001

PHONE: (033) 2230-8515; E-mail: rpsg.secretarial@rpsg.in; WEBSITE: www.spotboytracom.in

POLICY FOR PRESERVATION OF DOCUMENTS

1. INTRODUCTION

The Board of Directors ("**the Board**") of Spotboy Tracom Private Limited ("**the Company**") has adopted this policy on preservation of documents ("**this Policy**").

2. OBJECTIVE

This Policy contains guidelines for identifying Documents (defined later) that need to be maintained, the period of preservation of such Documents and its destruction/disposal. This Policy aims to provide efficient and systematic control on the periodicity and destruction of business-related Documents.

3. DEFINITIONS

The capitalized terms used in this Policy shall have the meaning ascribed to such terms in the Companies Act, 2013, rules made thereunder.

For this Policy, "**Document**" means a document maintained in any medium (paper, electronic, optical, magnetic, etc.), that is created, received, transmitted or used in the course of and in relation to the business of the Company.

Words importing the singular number shall, unless the context otherwise requires, also include the plural number and vice versa.

4. SCOPE

This Policy applies to all business functions of the Company but does not apply to personal or non-business information.

5. PERIODICITY OF PRESERVATION OF DOCUMENTS

The below guidelines shall be followed for proper preservation of documents.

Document Category	Document type	preservation period	Mode of preservation
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Company Operations	• Memorandum / Articles of Association; • Certificate of incorporation; • Certificate of commencement of business; • Licenses, certificates, approvals and other such documents issued by Central/State Government and any other statutory and/or regulatory body policies, Charters and Codes of the Company other related Documents.	Permanent	Physical and/ or electronically
Tax and Finance records	Books of accounts, including inter-alia, financial statements, vouchers relevant to entries in books of accounts, audit records, invoices, expense records, bank records etc. in accordance with the applicable provisions of the Companies Act, 2013, Income Tax Act, and any other applicable laws.	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
Secretarial records	Notice, agenda and notes to agenda of meetings of the Board and its Committees • Minutes of the Documents specified to be preserved for eight financial years under any applicable law/regulation/statute etc.	Permanent	Physical and/ or electronically
	Other Secretarial Records	Eight financial years	Physical and/ or electronically

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Legal	Executed copies of contracts/ agreements entered by the Company	Three years beyond the life of the contract or	Physical and/ or electronically
Employment/ Personnel records	Documents relating to individual personnel records, payroll, salary history, bonuses, performance reviews etc. Other personnel related documents	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
Information technology	Documents in relation to procurement of IT hardware, software, licenses etc. Operations & User Manuals License and Information Security Register Server logs Inventory of back up data	Eight financial years or such period as may be specified under applicable law/statute etc.	Physical and/ or electronically
Incidental or other business related information	Drafts and preliminary versions of documents superseded by work paper and other transitory information	As long it remains relevant	Physical and/ or electronically
	Any other document relating to the business of the Company	180 days as long as it remain relevant	Physical and/ or electronically

Where the preservation period of Documents is not included in the above identified categories, such period shall be determined by the application of the general guidelines affecting Document preservation identified in this Policy, as well as any other pertinent factors.

Any document not included above, should be maintained for a minimum period legally required and in other cases as determined by the CEO of the Company.

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6. ACCESSIBILITY AND RETRIEVAL OF RECORDS

Retention of Physical Records

Preserved records shall be kept confidentially, securely with access control and with ease of retrieval, whether in-house or externally. Measures should be taken for physical security of the records maintained like selection of area of record room firefighting device, access control, etc.

Retention of Electronic Records

Wherever allowed/required by any law/statute, records may be maintained in electronic form. In case records and documents are maintained in electronic form, all the requirements relating to Information Technology Act, 2000, including any statutory amendment(s) or modification(s) thereto, shall be adhered to.

In case of switch-over to another electronic system, it should be ensured that all the records in the old electronic system should be migrated to new electronic system and all old records are accessible in the new system.

7. DESTRUCTION OF DOCUMENTS

All information generated in the course of the Company's business activities that is not required to be retained must be safely destroyed or discarded as soon as practicable, but in any event within 180 days of the completion of the project/assignment/contract.

Physical:

The Documents should be destroyed at the end of the preservation period specified under Clause 5 of this Policy. The destruction should be carried out in a way that preserves the confidentiality of any information they contain, if so required. A record should be kept about the Documents that have been destroyed.

Records which are required to be maintained for certain period of time, shall be added to the archive when it no longer has a business need. Files or items when added to the archive will be recorded on a database that shall be maintained by the facilities and retrieving the records from the archive must be for valid business reasons.

Documents should be shredded through a paper shredding machine and not sold as scrap.

Electronic:

Electronic information, including e-mails that are no longer required to be retained, must be purged using appropriate techniques which ensure that the data cannot be reconstructed from the storage media on which it resided. Records stored on magnetic media must be destroyed by reformatting at least once. However, the backup copies of the records must also be destroyed.

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8. **RESPONSIBILITY**

Company Secretary or any person authorized by the Board shall be responsible for monitoring the implementation of this Policy.

9. **REVIEW AND AMENDMENT**

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the Statutory Provisions and remains effective.

This Policy shall be reviewed periodically and may be amended by the Board of Directors of the Company, as may be deemed necessary.

10. **INTERPRETATION**

In case of any conflict between the provisions of this Policy and of Statutory Provisions, the Statutory Provisions shall prevail over this Policy. Any subsequent amendment/ modification in the Statutory Provisions shall automatically apply to this Policy.

In case of any clarification required with respect to this Policy, kindly contact the Company Secretary of the Company.