



**ATLAS JEWELLERY INDIA LIMITED (AJIL)**  
**DOCUMENT RETENTION & ARCHIVAL POLICY (DRAP) -**

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## 1. Introduction

Securities and Exchange Board of India (SEBI) has notified SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 [hereinafter referred to as “**SEBI (LODR) Regulations 2015**” or “**The Regulations**”] on September 2, 2015 effective from 1<sup>st</sup> December 2015 for the purpose of conversion of existing listing agreements into a single comprehensive regulation for various types of listed entities.

Further Regulation 9 of SEBI (LODR) Regulations 2015 mandates that every listed entity shall formulate a policy for preservation of documents and Regulation 30(8) of the Regulations is also required to have an archival policy on archiving all information disclosed to stock exchange(s) and the same being hosted on the Company’s website.

## 2. AJIL- LODR DRAP Policy

2.1 Considering the recent introduction of the SEBI (LODR) Regulations 2015 and the high expectations the regulators demand from listed entities the Company has undertaken an intensive exercise to revisit all its Corporate Governance policies and procedures and make amendments/ update or even replace them with more pro-active policies in line with the new Corporate Governance initiatives by the regulators.

3. In view of the requirements as stated in Regulation 9 Read with Regulation 30(8) of the Regulation, ATLAS Jewellery India Limited (“**the Company**” or “**AJIL**”) has framed this policy to be called hereinafter as AJIL- Document Retention and Archival Policy (**AJIL\_LODR-DRAP**) which shall be effective from 1<sup>st</sup> December 2015.

## 4. Policy Objective

The broad objectives of this Policy is as under-

### 4.1 **Preservation of Documents**

The Company shall classify its documents for preservations under two categories, viz.-

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

### 4.2 **Archiving of Documents**

All events and information disclosed to the stock exchange(s) and hosted on the Company’s web site shall be archived for a period of three years after completion of five years from the date of disclosure to the stock exchange(s)/ hosted on the Company’s web site, whichever is later.

## 5. General Policy Guidelines

- 5.1 The law requires the Company to maintain certain types of corporate records either permanently or for a specified period of time. Failure to retain the records could subject the employees and the Company to penalties and fines, cause the loss of rights, obstruct justice, adversely impact potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation.
- 5.2 The Company expects all employees to fully comply with this Policy, provided that all employees should note the following general exception to any stated destruction schedule:
- If an employee has reasons to believe, or the Company informs the employee concerned, that Company records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), then the employee must preserve those records until the Legal or Respective Department determines that the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records. If an employee(s) believe that exception may apply, or has any question regarding the possible applicability of that exception, he/she may contact the Company Secretary of the Company or the Legal Department of the Company
- 5.3 The Company, from time to time 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. While minimum retention periods are suggested, the retention of the documents identified in those schedules and of documents not included in the identified categories should be determined by the **Senior Management**, primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.
- 5.4 Questions regarding this Policy shall be addressed to the Company Secretary at [secretary@atlasjewelleryindia.com](mailto:secretary@atlasjewelleryindia.com)
- 5.5 Failure to comply with this Policy may result in disciplinary action against the employee, including suspension or termination

## 6. Key Definitions

- 6.1 **“Act”**  
Means the Companies Act, 2013 including any statutory modification or re-enactment thereof.
- 6.2 **“Board”**  
Means the Board of Directors of the Company.
- 6.3 **“Document”**  
Means all Business Records and include essentially all records, whether paper or in electronic form. A record may be in the form of a memorandum, an e-mail, a contract or a case study, effort estimates and expense records.
- 6.4 **“Regulation”**  
Means SEBI (Listing Obligations and Disclosure Requirement) Regulations 2015
- 6.5 **“Senior Management”**  
Means personnel of the Company who are members of its core management team excluding Board of Directors comprising all members of management one level below the Executive Directors, including the functional heads.

## 7. Document Retention and Archival Policy

### 7.1 Permanent Documents:

Permanent Documents include all business documents (physical or electronic) which are statutorily or under this Policy are required to be retained to perpetuity.

### 7.2 Temporary Documents:

- 7.2.1 Temporary records include all business documents that are intended to be superseded by final or permanent records, or which are intended to be used only for a limited period of time, including, but not limited to written memoranda and dictation to be typed in the future, reminders, to-do lists, reports, drafts, and interoffice correspondence regarding a client or business transaction.
- 7.2.2 Temporary records can be destroyed or permanently deleted if in electronic form when a project or matter closes. Upon closing of such temporary files, the respective departments shall gather and review all such temporary records. Before destroying or deleting these documents make sure to have duplicates of all the final records pertaining to the project or matter. Upon destruction or deletion, organize the final records (and duplicates) in a file marked “Final” and store them appropriately, as required under this Policy.

### 7.3 Retained Documents:

- 7.3.1 Retained records include all business documents that are not superseded by modification or addition, including but are not limited to documents given (or sent via electronic form) to any third party not employed by the Company, or to any government agency; final memoranda and reports; correspondence; handwritten telephone memoranda not further transcribed; minutes; specifications; journal entries; cost estimates; etc.
- 7.3.2 Generally all Corporate records (whether electronic or otherwise) of the Company are to be retained for not less than Three (03) Years, unless otherwise expressly stated in this Policy and may be destroyed thereafter.

### 7.4 Document Retention Procedure:

Each Head of the Department shall identify and at all times maintain a schedule of temporary and retained documents.

### 7.5 Retention and Archival Policy for various categories of Documents:

#### 7.5.1 Records under Companies Act, 2013 and SEBI Regulations

Sl.No	Classification of Documents	For a Period of 3 Years	For a Period of 5 Years	For a period of 3 to 5 Years	For a Period of not less than 8 Years	Permanently
1	The Company shall maintain all records as per the Companies Act, 2013 and SEBI Regulations				√	
2	Documents that are to be made available on the Company's website in Compliance the Regulations will be made available on the website		√			
3	Documents made available on the Company's website in Compliance with the Regulations (Ref. Point 1.2 above) shall be archived	√				



**7.5.2 Tax Records and Books of Accounts**

Sl.No	Classification of Documents	For a Period of 3 Years	For a Period of 5 Years	For a period of 3 to 5 Years	For a Period of not less than 8 Years	Permanently
1	<b>Tax Records</b>					
1.1	Tax records includes, but are not limited to Documents concerning tax assessment, tax filings, tax returns, proof of deductions, appeal preferred against any claim made by the relevant tax Authorities. Tax Records shall be maintained for a period of 8 or for a period of 8 (Eight) Years after a final Order has been received with respect to any matter preferred for Appeal, as the case may be.				✓	
2	<b>Books of Accounts</b>					
2.1	The Books of Accounts and other relevant books and papers and financial statements for every financial year (Please Refer. S.128 of the Act) including its branch offices, showrooms, etc along with all supportings, relevant vouchers etc. for a period of not less than eight (08) financial years immediately preceding a financial year.				✓	

**7.5.3 Legal Documents**

Legal Documents shall include, but shall not be limited to contracts, legal opinions, pleadings, Orders passed by any court or tribunal, Judgments, Interim Orders, Documents relating to cases pending in any Court or Tribunal or any other Authority empowered to give a decision on any matter , Awards, Documents relating to property matters.

Sl.No	Classification of Documents	For a Period of 3 Years	For a Period of 5 Years	For a period of 3 to 5 Years	For a Period of not less than 8 Years	Permanently
1	<b>Contracts</b>					
1.1	A contract shall be retained for a period of 8 (Eight) Years or for 8 (Eight) Years after the expiry of the term of the contract, whichever is later.				✓	
1.2	<b>Property Documents</b> Documents relating to any property owned by the Company shall be retained perpetually.					✓
1.3	Other property Documents shall be retained for a period of 8 (Eight) Years or for a period of 8 (Eight) Years after the rights in such property ceases to exist, whichever is later				✓	
2	<b>Orders- Interim/ Final, Pleadings /Submissions</b>					
2.1	Final Orders- Orders passed by any Court or Tribunal or any Authority or Judgment which are final in nature and cannot be superseded shall be retained permanently.					✓
2.2	Interim Orders: To be retained till a Final Order is received or for a period of 8 (Eight) Years whichever is later.				✓	
2.3	Pleadings/Submissions- All pleadings and submissions related to any Court/ Tribunal/ other statutory proceedings shall be retained for a period of eight years or till the matter is disposed off, whichever is later.				✓	



**7.5.4 Board of Directors/ Committee of Directors Documents**

SI.No	Classification of Documents	For a Period of 3 Years	For a Period of 5 Years	For a period of 3 to 5 Years	For a Period of not less than 8 Years	Permanently
1	Minutes Book & Attendance Registers, Leave of Absence- Board of Directors and Committee thereof					✓
2	Agenda Papers and all materials related to Board/Committee Meeting	✓				
3	Any Communication received from Directors- e.g. Notice of Resignation, Calling of Meeting, etc.	✓				
4	Other Documents- Any other records like Circular Resolutions, other Board & Committee Communications	✓				

**7.5.5 Press Releases & Public Filings**

SI.No	Classification of Documents	For a Period of 3 Years	For a Period of 5 Years	For a period of 3 to 5 Years	For a Period of not less than 8 Years	Permanently
1	All Press Releases and Publicly filed Documents but shall not be limited to, any intimation given to the press regarding financial results, profits, Meetings of the Board, General Meetings, and overall performance of the Company.				✓	

**7.5.6 Intellectual Property Documents, Licenses & Permissions**

SI.No	Classification of Documents	For a Period of 3 Years	For a Period of 5 Years	For a period of 3 to 5 Years	For a Period of not less than 8 Years	Permanently
1	<b>Intellectual Property Documents</b> Intellectual Property Documents shall include, but shall not be limited to Copyrights, Trademarks, Patents, and Industrial Designs. Intellectual Property Rights Documents					✓
2	<b>Licences &amp; Permissions</b> Licenses & Permissions shall be retained till the time the validity of the License/Permission and for a period of 8 (Eight) thereafter or for a period of at least 8(Eight) Years, whichever is later				✓	



**7.5.7 Other Departmental Documents**

SI.No	Classification of Documents	For a Period of 3 Years	For a Period of 5 Years	For a period of 3 to 5 Years	For a Period of not less than 8 Years	Permanently
1	<b>Employment Records</b> Employment Records includes recruitment, background check reports, employment and personal information, These records also reflect performance reviews and any other matter/s arising out of the course of employment, such as actions against the personnel. These records shall be retained for a period of 3 (Three) Years following the cessation of employment.	√				
2	<b>Sales &amp; Marketing Plans &amp; Documents</b> All relevant marketing and sales documents of the Company shall be retained for a period of atleast Five (5) Years			√		
3	<b>Internal Audit Documents</b> All Internal Audit, Plans, documents and related papers related to the internal audit of the Company, its branches and showrooms			√		
4	<b>Legal &amp; Compliance Department</b> All documents, records of the Legal and Compliance Department shall be maintained under various classifications as applicable or as Statutorily required and generally for atleast Eight (08) Years				√*	
5	<b>Other Departmental Documents</b> are to be retained for not less than Three (03) Years, unless otherwise expressly stated in this Policy	√*				

**\* Please read the explanation provided under” Classification of Documents”**

**7.5.8 E-MAIL POLICIES**

SI.No	Classification of Documents	For a Period of 3 Years	For a Period of 5 Years	For a period of 3 to 5 Years	For a Period of not less than 8 Years	Permanently
1	<b>Email Documents</b>				√	
1.1	E-mails relating to audit work papers and financial controls should be retained				√	
1.2	All emails to the Company’s Officers or Audit Committee relating to complaints on auditing,accounting, frauds or internal controls, under the Vigil Mechanism Policy or otherwise				√	
1.3	Concerns under Vigil Mechanism Policy shall be retained for a period of Eight (8) Years or till completion and disposal of the Concern, which is later				√	
1.4	Email Communication of routine nature with Shareholders , RTA in the normal course shall be retained for a period of Three (3) Years, other than those under SCORES or other statutory requirements, then as laid down statutorily or as covered in this Policy.	√				



- 7.5.8.1 All electronic communication systems as well as all communications and stored information transmitted, received, or contained on the Company's information systems are the property of the Company.
- 7.5.8.2 Employees using this equipment for personal purposes do so at their own risk.
- 7.5.8.3 Employees have no expectation of privacy in connection with the use of Company equipment or with the transmission, receipt, or storage of information using the Company's equipment.
- 7.5.8.4 Authorized Company personnel may access communications and stored information at any time without notice or consent.
- 7.5.8.5 Employees should avoid using Company e-mail for personal purposes. Personal e-mails should be deleted as soon as possible.
- 7.5.8.6 E-mails relating to audit work papers and financial controls should be retained for **at least 8 years**.
- 7.5.8.7 All emails to the Company's Officers or Audit Committee relating to complaints on auditing, accounting, frauds or internal controls should be retained permanently.
- 7.5.8.8 Any messages exchanged between the Company and third parties (such as consultants and auditors) should be archived, regardless of their content.

## **7.6 Record Maintenance and Storage**

- 7.6.1 All records in physical form are to be maintained by the Respective Department(s) at the respective locations or at Head Office.
- 7.6.2 If documents need to be sent to Head Office, the respective departments may either maintain a physical mirror file or keep the documents in electronic form (scanned or otherwise)
- 7.6.3 Electronic version(s) of all records are to be maintained within the Company's as per the IT Department from time to time.

## **7.7 Records Disposal**

- 7.7.1 Physical records disposed of pursuant to the retention periods specified in this Policy shall be disposed in a proper manner.
- 7.7.2 In the event that it is necessary to manually dispose of an electronic record, the IT Department shall use the "permanent delete" function to permanently dispose of electronic records.



**8. Put on Hold” Document destruction”**

8.1 If a lawsuit or other proceeding involving the Company is reasonably foreseeable, all destruction of any possibly relevant documents, including e-mail, must cease immediately.

8.2 Documents relating to the lawsuit or potential legal issue will then be retained and organized under the supervision of the Company Secretary or Legal Department.

8.3 Legal Department / Company Secretary shall immediately notify all appropriate employees by e-mail or by any other means (depending on exigencies) that they are not to dispose of relevant Temporary Records or other records until notified otherwise. Such communication shall be binding on all Company employees including Directors.

8.4 Violation of this aspect of the Company’s Document Retention Policy could subject the Company and the employees involved to civil and criminal penalties.

**9. Amendment**

This Policy shall be reviewed periodically by the Senior Management and amendments effected to subject to approval of the Board if and when practical difficulties are encountered. The Senior Management may also review the Policy to comply with any local State, Central Legislations or Statutory demands that may be promulgated from time to time.

**10. Disclosures**

The Company shall disclose this Policy on its website

**11. Scope and Limitation**

In the event of any conflict between the provisions of this Policy and the SEBI (LODR) Regulations 2015 or Companies Act, 2013 or any other statutory enactments, rules, circulars, notifications, then the provisions of such Regulations/Companies Act, 2013 or statutory enactments, rules, circulars, notifications shall prevail over this Policy. Any subsequent amendment / modification in the Regulation, Act and/or applicable laws in this regard shall automatically apply to this Policy.

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