

LUMINA DATAMATICS LIMITED

DOCUMENT RETENTION & ARCHIVAL POLICY

Title	Document Retention & Archival Policy		
Department	Legal & Secretarial	Version	1.0
Date of Effect	January 18, 2023	Date of Next Review	March 31, 2026

1. OBJECTIVE:

The Policy is framed by the Board of Directors of Lumina Datamatics Limited (“the Company/ Lumina Datamatics”) in line with the provisions of Companies Act, 2013 and rules framed thereunder:

- 1.1 to outline the guidelines for preservation period of documents / records of the Company, in sync with the commercial and legal requirements, and to reasonably safeguard them from damage, loss, alteration, or destruction;
- 1.2 To ensure systematic retention of records, and facilitate access of documents received or created in the course of business, in a form that is fit for all end users, by implementing good archiving procedures & processes.
- 1.3 To avoid inventory of redundant documents / records so as to optimize usage of storage space.

2. SCOPE & APPLICABILITY:

- 2.1 All the records and documents at all locations of the Company, including but not limited to memorandum, contracts, notices, declarations, form, e-mails, letters, time sheets, effort estimates and expense records.
- 2.2 Information and documents uploaded on the Company’s website.
- 2.3 The physical as well as electronic documents / records, both are governed by the same legislative requirements and are subject to the same degree of confidentiality & care.

3. DURATION OF MAINTAINING RECORDS:

The following aspects are to be considered while arriving at the preservation period:

- Company's own information retrieval needs (reference value);
- Statutory requirements;
- Litigation requirements.

4. DOCUMENT / RECORD CLASSIFICATION:

The preservation of Documents shall be done in the following manner:

- 4.1 Where there is a period for which a document / record is required to be preserved as per the applicable statute(s), for the period required by such statute(s).
- 4.2 Where there is no such requirement as per applicable statute(s), then for such period as the document / record pertains to a matter which is recent.
- 4.3 In case of any other document / record, for such period, as a competent officer of the Company required to handle or deal with the document / record takes a considered view about its relevance.

Provided that generally speaking, a document / record may be preserved for a period of five years from the date on which the document / record was originated.

The documents / records, are classified under the following categories for determining the preservation period:

- The list of documents / records to be preserved permanently is attached to this Policy as **Annexure A**.
- The list of documents / records to be preserved for not less than eight years after / upon / from completion of the relevant transactions is attached to this Policy as **Annexure B**.

The attached Annexures A & B indicate an illustrative (not exhaustive) list of record retention of the Company.

The preservation period starts with the conclusion of financial year, in which the document has been formed or the last entry was made; the preservation period of agreements starts with the end of the financial year in which the agreement period expires.

5. **CONTROL OF RECORDS:**

5.1 **Version control**

Earlier versions of a document may be deleted once the previous versions are no longer needed. However, the documents containing significant decisions, reasons & actions and those containing significant information which is not contained in the final form of the record must also be preserved along with the final version.

5.2 **Security**

Records shall be made accessible to authorised users. Employees of the Company enacting the normal course of their duties will have access to relevant records of the Company.

5.3 **Storage**

- Records shall be stored in conditions that are clean, dust free and secure, with lowest risk of damage from fire, water, dampness, insects and rodents, etc.
- The records shall be kept away from direct sunlight and other sources of light & heat. The storage area shall be well ventilated and ideally maintained at a stable temperature & humidity.
- Records in the form such as photographs, maps or computer disks shall have specialized storage conditions and handling process that can take into account their specific physical and chemical properties.
- Irrespective of format, records of continuing value shall have higher quality storage and handling in order to preserve them for as long as that value exists.

The Company shall ensure appropriate provision for the backup of its digital collections, including the provision of offsite security copies. The backup copies shall be actively maintained to ensure their continued viability. The Company shall maintain the digital collections and technical infrastructure required to manage and access them can be restored in the event of an emergency.

6. **PRESERVATION LOCATION:**

The preservation location will be the concerned department. If the location is other than the concerned department, the same should be documented and kept in a file for reference purpose in the respective department. In case of critical documents which need to be preserved for very long periods or permanently, the same shall be preserved in fire proof or other such secure cabinets.

7. **AUTHORITY & RESPONSIBILITY:**

- 7.1 The respective Functional Heads shall be responsible for implementing and maintaining sound record keeping practices within their respective units.
- 7.2 Every employee shall be responsible for making, maintaining and preserving the necessary records and documents of his / her own job / function / area of activity, as may be required under the applicable statute(s) from time to time.
- 7.3 Respective functional heads should necessarily approve any destruction / deletion of important records. Related units / departments / persons who create or use such records should be kept informed of such decision.
- 7.4 Failure to comply with this policy may result in disciplinary action against the employee.

8. **DESTRUCTION OF OBSOLETE DOCUMENTS:**

The records/documents preserved shall be reviewed every year or according to the need by the respective department and action taken to destroy those records which are due for disposal. The obsolete documents may be discarded within 30 days of the end of the retention period.

8.1 **Destruction of paper records:**

Paper records shall be shredded off / placed in security bins or burnt in front of a couple of witnesses. They shall never be placed in unsecured bins or rubbish tips.

8.2 **Destruction of magnetic media:**

Records stored on magnetic media, such as hard disks, floppy disks, etc. shall be deleted / destroyed by reformatting, at least once. Deleting files from magnetic media is not sufficient to ensure the destruction of the records. Backup copies of the said records shall also be destroyed.

8.3 **Destruction of optical media:**

Records held on optical media such as rewritable disks shall be deleted by cutting, crushing or by other means.

9. **GUIDELINES FOR ARCHIVING THE DOCUMENTS HOSTED ON THE WEBSITE OF THE COMPANY:**

9.1 **Information hosted on the website pursuant to applicable Law/ Guideline:**

All other documents/ information which are hosted on the website of the Company pursuant to any Law/ Guideline as may be applicable to the Company from time to time, shall be retained on the website for such minimum period of time as may be specified under such Law/ Guideline or five years, whichever is more.

The Document may thereafter be shifted to the Archive Section of the website, where

it shall be retained for a minimum period of three years, after which it may be removed from the website.

Notwithstanding the above, the Management shall have the discretion to host any of such documents on the website of the Company for such additional period as the management may deem fit on a case to case basis.

9.2 Other information voluntarily hosted on the website:

All information /documents hosted on the website of the Company voluntarily by the Management, shall be retained on the website/ Archive section of the website for such period of time as may be deemed fit at the absolute discretion of the Management of the Company.

10. POLICY REVIEW AND AMENDMENTS:

The Board will constantly review, and if found essential, may amend this policy from time to time, so that the policy remains compliant with applicable legal requirements.

11. SCOPE AND LIMITATION:

In the event where the terms of this policy differ from the provisions of any existing or new statutory enactments, Rules or standard governing the Company, the provisions of such statutory enactments, rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to be severed from the Policy and the rest of the Policy shall remain in force.

Approved by
For and on behalf of Board of Directors

Sd/-
Sameer L. Kanodia
Managing Director & CEO

ANNEXURE – A

DOCUMENTS TO BE PRESERVED PERMANENTLY

1. Memorandum of Association & Articles of Association.
2. Register and index of Members.
3. Register of Transfer of Shares.
4. Register of Transmission of Shares.
5. Register of Renewed & Duplicate Share Certificates.
6. Register of Charges.
7. Register of Contracts in which Directors are interested.
8. Register of Directors & Key Managerial Personnel.
9. Register of Directors' Shareholding.
10. Register of Inter-Corporate Loan, Investment and Guarantee.
11. Register of investments in securities not held in the name of the Company.
12. Register of Debenture-holders.
13. Register of transfer of Debentures.
14. Register of Transmission of Debentures.
15. Register of documents executed under the common seal.
16. Register of records and documents destroyed.
17. Minutes of General meetings, Board Meetings and Committee Meetings.
18. Record of Employee Stock Purchase Scheme.
19. Policies formulated under various statutes, if any.
20. Forms and returns filed with the Registrar of Companies / Ministry of Corporate Affairs.
21. Certificates issued by the Registrar of Companies.
22. Any court order / Tribunal order.
23. Annual Reports.
24. Any other document, as may be decided by the Management or required by Statute.

ANNEXURE – B

DOCUMENTS TO BE PRESERVED FOR A PERIOD OF AT LEAST UPTO 8 YEARS

1. Register of Buy-back of securities, from the date of completion of buy-back.
2. Register of Deposits, from the date of last entry.
3. Register of Allotment, from the date of each allotment.
4. Register of Dividend, from the date of payment.
5. Register of Directors' attendance.
6. Register of Proxies, from the date of meeting.
7. Register of Inspection from the date of last inspection.
8. Register of Investor Complaints, from date of last entry.
9. Records of issued and cancelled Share / Debenture certificates.
10. Register of Sweat equity shares, from the financial year in which the latest entry is made.
11. Books of accounts, together with vouchers, records and papers relevant to any entry in the books for a period of 8 accounting years immediately preceding the current accounting year.
12. Annual Returns
13. Any other document, as may be decided by the Management or required by Statute.