

Policy on Preservation of Documents and Archival.

1. Purpose and Scope

In accordance with the provisions of the Companies Act, 2013 and in accordance with the provisions of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR"), The Board of Directors of Infra Industries Limited have laid down the Policy for Preservation and Archival of Documents. The SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 mandates that the documents be classified in at least two categories as under:

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

Provided the Company may keep documents specified in clauses (a) and (b) in electronic mode

This policy is framed for the purpose of systematic identification, categorization, maintenance, review, retention and destruction of documents received or created in the course of business which can be revised/ modified by the Company with the approval of the Board.

2. Classification of Documents to be preserved / retained:

- 1. Documents that need to be preserved / retained permanently – Doc 1
- 2. Documents that may be preserved / retained for a period of 8 years as specified under the Companies Act, 2013 or LODR – Doc 2
- 3. Documents to be preserved electronically and archived when necessary – Doc 3
- 4. Documents that may be required by judicial proceedings and which may be destroyed after closure of the legal case – Doc 4
- 5. Emails and electronic documents – Doc 5

6. Documents like budget papers, bank guarantees etc., which may be retained for less than 8 years – Doc 6

3. Administrator

All the Employees in the permanent rolls of the Company are responsible for taking into account the potential impacts on preservation of the documents in their work area and their decision to retain/preserve or destroy documents pertaining to their area.

4. Periodical Review of the Policy by Top Management

This policy should be reviewed and amended periodically by the Top Management subject to approval of the Board. The Top management may also review the policy on document retention to comply with any local, state, central legislations that may be promulgated from time to time

5. Administration

The Record Retention Schedule approved by the Board of Directors for initial maintenance, retention and disposal schedule for physical records is as given in the annexure

6. Suspension of Record Disposal in the event of Litigation or Claims

In case the Company is served with any notice for request of documents or any employee becomes aware of a governmental investigation or audit concerning Infra Industries Limited or commencement of any litigation against the Company, such employee shall inform the Top Management and any further disposal of documents shall be suspended until such time as the Top Management determine otherwise.

7. Type of Record

1. Accounting and Finance records including Annual Financial statement
2. Insurance Records

3. Tax records
4. Contracts entered into by the Company including Marketing Contracts
5. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities
6. Legal Files and Records
7. Property Records
8. Personnel and HR Records
9. Corporate Social Responsibility Records
10. Correspondence and Internal Memoranda
11. Electronic Documents including email retention and back up
12. Miscellaneous Records

1. Accounting and Finance records including Annual Financial statement

Record Type	Retention Period	Document Type
Accounts Payable ledgers and schedules	8 Years	Doc 2
Accounts Receivable ledgers and schedules	8 Years	Doc - 2
Annual Audit Reports and Financial Statements, Tax and Vat Audit	Permanent	Doc - 1
Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit	Doc 2
Bank Statement and Cancelled Cheques	8 years	Doc - 2
Employee Expense Reports	8 years	Doc - 2
General Ledger	Permanent	Doc - 1
Investment Records	Permanent	Doc - 1

Security deposit receipt copies	3 years after termination of the contract	Doc - 6
Fixed Asset Register with supporting Purchase Orders and Bills for fixed assets addition	Permanent	Doc - 1
Cost records	8 years	Doc - 2
Payroll extract, salary advice and payroll JVs	8 years	Doc - 2
Payroll TDS, PF, Gratuity, ESI return and challan applicable on payroll	Permanent	Doc - 1
Credit approvals from bank	Permanent	Doc - 1
Bank Account passbook or statement, Bank Reconciliation Statement and LC Documents	8 years	Doc - 2
Bank Guarantees	Till the expiry of the claim period	Doc - 6
Tax Litigation documents	Permanent	Doc - 1
Bill of entries	Permanent	Doc - 1

2. Insurance Records

Record Type	Retention Period	Document Type
Annual Loss Summaries	8 Years	Doc 2
Audits and Adjustments	8 Years	Doc - 2
Claim Files (Including correspondence, medical records, injury documentation, etc.	Permanent	Doc - 1
Insurance Policies for the Company	Permanent	Doc - 1
Journal Entry Support Data	8 years	Doc - 2
Releases and Settlements	Permanent	Doc - 1

3. Tax records

Record Type	Retention Period	Document Type
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Tax Exemption Documents and related correspondence	Permanent	Doc 1
Excise Tax records	Permanent	Doc - 1
Payroll Tax records	8 years	Doc - 2
Tax Bills, Receipts, Statements	8 years	Doc - 2
Tax Returns – Income, Franchise, Property	Permanent	Doc - 1
Tax workpaper packages Originals	8 years	Doc - 2
Sales Tax Records	8 years	Doc - 2
Annual Information Returns – State and Central	Permanent	Doc - 1
Service Tax Records	8 years	Doc - 1

4. Contracts entered into by the Company including Marketing Records

Record Type	Retention Period	Document Type
Contracts and Related Correspondence	8 years	Doc - 2

5. Corporate Records including Certificate of Incorporation, Listing Agreement and other approvals from other statutory authorities

Record Type	Retention Period	Document Type
Corporate Records (certificate of incorporation, commencement of business, listing agreement, common seal, minutes book of board and committees thereof, annual reports originals, etc.)	Permanent	Doc - 1
Licence and Permits, Industrial entrepreneurial Memorandum, and other statutory approvals	Permanent	Doc - 1
ROC Filings and Stock Exchange filings in physical and Electronic form	5 years from the date of filing	Doc 6

6. Legal Files and Records

Record Type	Retention Period	Document Type
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Legal Memoranda and Opinions	3 years after the closure of the matter	Doc - 4
Litigation files	1 year after expiration of disposal of the case	Doc - 4
Court Orders	Permanent	Doc - 1
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent	Doc - 1
Original Purchase / Sale Deeds	Permanent	Doc - 1
Original Lease Agreements	8 years after expiration of the lease	Doc - 2
Intellectual Property Servicemarks/trademarks and Copyrights	Permanent	Doc - 1

7. Property Records

Record Type	Retention Period	Document Type
Purchase and Sale Agreements	Permanent	Doc - 1
Records and Correspondences with the Authorities	Permanent	Doc - 1

8. Personnel and HR Records

Record Type	Retention Period	Document Type
Personnel Files of individual employees	Permanent	Doc - 1
Commission / Bonuses / Incentives / Awards	8 years	Doc - 2

Employee Earnings Records	3 years after termination of service employment	Doc - 6
Employee Handbook & Induction Manual	Permanent	Doc - 1
Employee Medical Records	3 years after termination of service employment	Doc - 6
Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers	3 years after termination of service employment	Doc - 6
Employment Contracts Individual	3 years after termination of service employment	Doc - 6
Correspondence with Employment Agencies and Advertisements for job openings	3 years	Doc - 6
Job Description	3 years after superseding the	Doc - 6

11. Corporate Social Responsibility Records

Record Type	Retention Period	Document Type
Records on CSR Projects(including amount budgeted, spent and balance if any) projects undertaken and progress thereon	Permanent	Doc - 1

12. Correspondence and Internal Memoranda

General Principle : Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract is active

- I. Those pertaining to routine matters and having no significant, lasting consequences, should be discarded within two years
- II. Those pertaining to non routine matters or having significant lasting consequences, should generally be retained permanently

12. Electronic Documents including email retention and back up

1. Electronic Mail : Not all email needs to be retained, depending on the subject matters

- All e-mail – from internal and external sources to be deleted after 24 months
- Staff will strive to keep all but an insignificant minority of their email related to business issues
- Staff will not store or transfer the Company related emails on non-work related computers except as necessary or appropriate with due approvals from the Central IT team and the respective Managers
- Staff will take care not to send confidential / proprietary information to outside sources

Document Type : Doc 5

2. Electronic Documents including PDF files

- PDF documents – Can be a maximum period of 8 years. But the said document may be destroyed depending upon the completion of the job or its use coming to an end
- Text/ Formatted files : All word / excel / Power point files may be deleted once every year depending on the importance.

Document Type : Doc – 3

3. Web page files

- May be retained for a period of 5 years as specified in SEBI's LODR Regulations, 2015
- May be archived by the I.T. department with the support of the service provider for a period of 3 years after the initial period of five years of live page

12. Miscellaneous Records

Record Type	Retention Period	Document Type
Consultant Reports	3 years	Doc - 6