

## 1. Objective

The Policy is framed in pursuant to the requirements of the Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as 'Regulations'), with respect to preservation of documents.

The policy deals with the retention and archival of the 'Records' of SQS India BFSI Limited ("Company") which may be broadly classified under the following categories:

- 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.
- c) Documents whose preservation shall be for such period as mandated by relevant law, as applicable from time to time or required to be preserved for enquiry, evidence, verification, evaluation etc.
- d) All other documents not covered under clause a) to c) above, whose preservation shall be for such period(s) as may be decided by the Responsible Officer of the Company.

## 2. Scope

This policy would ensure safekeeping of the records. It not only covers the various aspects on preservation of the documents, but also proper disposal/destruction of the documents. The Company, therefore, formulates this policy to aid the employees in handling the documents efficiently.

## 3. Approval of the policy

Pursuant to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, issued on September 2, 2015, the Board of Directors approved the "Policy on Preservation of Documents". The Board shall review, and if found required, may amend this Policy from time to time. The policy has been approved by the Board of Directors on March 30, 2016.

## 4. RESPONSIBILITY

The Head of the respective Departments of the Company who are responsible for relevant areas of the Company's operations (Responsible Officers) shall be responsible for preservation of the documents as

per the terms of this policy. It is the duty of the responsible officer to maintain a list of documents to be preserved in terms of this policy. In case the activity is outsourced it shall be the duty of the responsible officer to ensure compliance of this policy.

## 5. Policy

### I. Classification:

The preservation of documents shall be done in the following manner, which can be classified as below:

- a) Permanent preservation;
- b) Where there is a period for which a Document is required to be preserved as per applicable Laws, for such period as required by applicable Law.
- c) Documents with preservation period of not less than eight years after completion of the relevant transactions

All customer supplied document shall be retained as agreed with the customers.

All customer related documents generated /agreed by the Company like MSA, invoicing information, service deliverables shall be preserved for a minimum period of 8 years from the completion of work or shall be based on clients' requirements, whichever is later. Apart from these documents all proposals & RFPs which result in an MSA or customer order shall also be preserved for a minimum period of 8 years.

Critical delivery processes and delivery support processes, work products and records shall be identified and listed exhaustively in the respective process modules for appropriate storage, access and destruction / disposal. All project documents / records are to be stored as defined in the respective process modules.

- d) Where there is no such requirement as any applicable Law / customer requirements, then for such period the document is relevant with reference to any ongoing litigation, incidents, forensic reports, proceedings, complaint, dispute, contract or any such similar requirements. The Company has a duty to preserve documents when a lawsuit or other proceeding involving the Company is reasonably anticipated. In such situations, destruction of all relevant documents, including e-mails, shall be withheld till such time the matter is finally disposed off legally or otherwise.

e. In case of any other Document, not covered as above for such period, as the Responsible Officer of the Company, takes a considered view about its relevance;

An indicative list of documents whose preservation shall be permanent in nature or of not less than 8 years are provided in Annexure "A".

## II. Modes of preservation

The Documents may be preserved in

- i) Physical Form or
- ii) Electronic Form.

The document, whether to be stored in physical form or in electronic form shall be decided based on the legal requirements, ease of access and period of storage. If necessary, the same documents may be stored in both physical and in electronic form.

The preservation of Documents should be such as to ensure that there is no tampering, alteration, destruction or anything which endangers the content, authenticity, utility or accessibility of the Documents.

The preserved Documents must be accessible at all reasonable times. Access may be controlled by the respective Head of the Department (HOD) or Person authorized by HOD ("Authorized Persons") for this purpose, so as to ensure integrity of the Documents and to prohibit unauthorized access.

Documents uploaded in the website shall be maintained for a minimum period of 5 years and shall be held in archival for 3 years.

## III. Storage and Custody of the documents:

Storage of all documents shall be done in Company's authorized premises only. In the case where the documents are stored in electronic form then the same shall be done either at the Company owned servers / storage devices. In case if stored in the cloud or any third party storage devices / servers then the same shall be done with due approval from the Responsible Officer.

Where the Responsible Officer tenders resignation or is transferred from one location of the Company to another, such Person shall hand over all the relevant Documents, lock and key, access control or password, or other media / storage devices or such other Documents and devices in his possession to the proposed Responsible Officer or person authorized by him.

## IV. Conversion of the form in which the Documents are preserved

The physical Documents preserved may be converted, whenever required, into Electronic form to ensure ease in maintenance of documents and efficient utilization of space as approved by the Responsible Officer.

Where a Document is being maintained both in physical form and in Electronic form, the authenticity with reference to the physical form should be considered for every purpose.

## V. E-Mail Policies

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. Employees using this equipment for personal purposes do so at their own risk. 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. Authorized Company personnel may access communications and stored information at any time without notice or consent.

E-mails relating to audit work papers and financial controls should be retained for at least 8 years. All emails to the Company's Officers or Audit Committee relating to complaints on auditing, accounting, frauds or internal controls should be retained permanently.

Any messages exchanged between the Company and third parties (such as customers, vendors, consultants and auditors) should be archived at least for a period of 2 years, regardless of their content.

Any mails to the statutory authorities should be archived permanently.

## VI. Destruction of Documents

After the expiry of the statutory retention period or such other retention period as detailed above, the preserved documents may be destroyed in such mode under such instructions approved by the Compliance Officer supported by due recommendation by the respective Responsible Officer or as such policy as may be applicable in this regard. Destruction of documents as a normal administrative practice will also be followed for the records which are duplicate/unimportant/irrelevant.

This applies to both physical and electronic documents.

# POLICY ON PRESERVATION OF DOCUMENTS



The Documents (physical or electronic) shall be destroyed after entering the required details in the manual Register maintained by respective departments for this purpose. The format of register is given in Annexure – B. The entries in the register shall be authenticated by the Responsible Officer.

## Periodic report of the disposal:

A summary of disposal shall be prepared every quarter and made available for audit purposes.

## e) Authority to make alterations to the Policy

The policy should be reviewed periodically and amendments effected to be subject to the approval of the Board of Directors of the Company. Such periodic review shall also ensure compliance with any relevant legislations as may be applicable and as amended from time to time.

## f) Dissemination

A copy of this policy shall be placed on the website of the company and also in the Intranet of the Company to enable free access to the employees.

## g) Revision History

S. No	Revision No	Revision Date	Details of Revision	Prepared by	Approved by
1	Initial	30-March-2016	Initial Release	Prepared by: Akila S, Company Secretary; Reviewed by : N. Vaidyanathan, CFO	Board of Directors

## Annexure – A

### I. Documents whose preservation shall be permanent in nature:

- (i) Corporate Registration Certificates
- (ii) Licenses & Statutory Approvals
- (iii) Statutory registers required under applicable laws
- (iv) Audited financial statements and Audit Reports
- (v) Minutes of General Meeting
- (vi) Minutes of Board Meeting
- (vii) Minutes of various Committee Meetings
- (viii) Material Agreements/Contracts
- (ix) Orders issued by Courts/Statutory bodies
- (x) Share certificates of the Wholly Owned Subsidiaries of the Company
- (xi) Tax Returns
- (xii) Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

### II. Documents with preservation period of not less than eight years

- (i) Books of Accounts
- (ii) Annual Return(s)
- (iii) Annual Plans and Budgets
- (iv) Bank Statements and Cancelled Cheques
- (v) Personnel Documents (i.e. relating to recruitment, employment and personnel information, key training documents, Background verification documents, performance review, action taken by or against any employee, complaints by or against any employee), exit and settlement documents.
- (vi) Insurance Policies/ Claims under various policies
- (vii) Press Releases
- (viii) Correspondences with Departments/shareholders
- (ix) Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

# POLICY ON PRESERVATION OF DOCUMENTS



## Annexure B

The format of the register of Documents disposed/destroyed:

SI.No.	PARTICULARS OF DOCUMENT ALONGWITH PROVISION OF APPLICABLE LAW IF ANY	DATE	MODE OF DESTRUCTION	INITIALS OF THE HEAD OF DEPARTMENT	INITIAL OF THE PERSON ASSIGNED WITH THE TASK OF DISPOSAL