

RECORDS RETENTION AND PRESERVATION POLICY

INTRODUCTION

TBI Corn Limited (the “Company”/”TBICL”) is guided by various legal, regulatory and statutory requirements as applicable from time to time, with regard to record keeping, record retention and destruction of obsolete records.

The records are to be maintained based on the type and kind of records in a manner so as to comply with all applicable Acts, Rules, Regulations and Guidelines, and the retention periods indicated therein.

Further, Regulation 9 the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “Regulations”) requires the Company to have a Policy for preservation of documents.

In view of the above, the Company has framed this Policy for records retention and preservation (the “Policy”).

OBJECTIVES

The objective of the Policy is to ensure that all important documents, generated or received by TBICL, are adequately maintained and preserved in compliance with the applicable statutory provisions and to facilitate destruction of documents that are no longer required, at an appropriate time.

The policy establishes the guidelines for management, retention, preservation and destruction of documents, both in physical form and electronic form, by TBICL.

DOCUMENTS

“Documents” refers to all papers, records, writings, communications, including agreements, sale / conveyance deeds, licenses, judgments, orders, approvals, registration certificates, building plans, vouchers, etc. generated or received by TBICL in the course of its business either in physical form or in electronic form.

Documents generated or received in “electronic form” would include but not limited to emails and attachments, scanned papers, word documents, presentations, spreadsheets, databases, picture / graphic files, computer generated faxes, calendars, network access files and internet usage files, etc.

SCOPE

This policy shall apply to all documents generated or received by TBICL, both in physical form as well as electronic form.

RESERVATION SCHEDULE OF DOCUMENTS

The Documents shall be preserved under following two categories

- Permanent
- Specified periods, being
 - a. the period mandated under applicable laws;
 - b. the period duly approved by the Functional Head at the Head Office, as per the business needs of TBICL;
 - c. not less than eight years in other cases;

All documents which are required to be preserved permanently may also be additionally stored electronically / digitally.

All Documents must be properly classified, filed, labelled, indexed and stored by the respective departments.

The head of each department at divisional head office shall designate an officer of the department who shall ensure compliance with this Policy.

DISPOSAL OF DOCUMENTS

Documents which are not required to be preserved beyond the “specified period” as per this policy shall be destroyed by the respective department with the approval of Functional Head at divisional head office after the specified period.

PRESERVATION OF DOCUMENTS PERMANENTLY

All Documents as may be required under the applicable statute, laws, rules and regulations, namely but not limited to, documents pertaining to certificate of incorporation, PAN card, licenses, title deeds, sale / conveyance / lease deeds, general power of attorney, database, drawings, agreements, registration certificates, statutory / regulatory approvals, trusts deeds, patents, trademarks, copy rights etc. shall be preserved permanently or till the time the asset is in existence with company.

Statutory records and registers required to be maintained under the provisions of the Companies Act shall be preserved permanently.

Minute books containing minutes of the Board Meeting, Board Committee Meeting, General Meetings of members, Court convened Meetings, Meetings of Creditors, etc. shall be preserved permanently.

Agenda items and approval note for the agenda items along with relevant annexures thereto pertaining to the meeting of the Board / Committee of the Board shall be preserved permanently.

The record of disposal / destruction along with the approval obtained shall be preserved permanently.

PRESERVATION OF DOCUMENTS FOR SPECIFIED PERIOD

All books of account, vouchers, supporting documents, etc. shall be kept in good and proper physical condition at-least for a period of eight financial years after the financial year to which they relate to.

The documents relating to assessment of the Company under the direct and indirect taxes shall be preserved for a period of at least eight years after the financial year to which they relate to.

However, wherever any enquiry has been initiated or legal proceedings with respect to taxation issues is under process, then in such cases all related documents pertaining to the subject issue are to be preserved in proper manner till such time the matter is finally concluded.

All disclosures made by the company to the stock exchanges shall be hosted on the website of the company for a minimum period of five years as per the web archival policy of the Company.

In addition to the above, all other Documents shall be preserved for such period as may be specified in the relevant statute, law, rules, regulation, guidelines, etc. applicable to the respective department.

PRESERVATION OF DOCUMENTS BEYOND SPECIFIED PERIOD

Notwithstanding anything contained in this policy, in case of any directions from any statutory authorities, tribunals, tax authorities, registrar of companies, court of laws, etc. by an order in writing to preserve any specific document for a period beyond the specified period under this policy, then the concerned department of TBICL would be bound to preserve such documents for such period beyond the specified period till the matter is finally concluded.

AMENDMENT TO THE POLICY

The Policy facilitates preservation and disposal of “Documents” under the Acts, Rules, Regulations, Guidelines, etc. generally applicable to the company. In case of any modification / amendment / re-enactment of any existing acts, rules, regulations, guidelines, etc. or an enactment of any new act, rules, regulations, guidelines, etc., which are inconsistent with this policy, then such modified / amended / re-enacted provision or new provisions shall prevail over the policy.

Board is authorized to approve amendment to this Policy so that it is consistent and in compliance with the prevailing provisions of applicable Acts, Rules, Guidelines, Regulations as well as in accordance with administrative /business requirements of the Company.

DISCLOSURE ON WEBSITE

A copy of the policy including amendments thereto shall be hosted on the website of the Company.