

SRM Energy Limited

Records Retention Policy

(Effective from December 1, 2015)

(Amended on 21st August, 2020)

RECORDS RETENTION POLICY

1. Preamble

The Board of Directors (the “Board”) of SRM Energy Limited (the “Company” or “SRMEL”), has adopted the following Policy with regard to retention and preservation of records and documents of the Company including electronic records and documents. The Company directs and expects all employees, officers, and directors of the Company to follow the rules set forth herein. The Board of Directors will review and may amend this policy from time to time.

2. Purpose

This Policy is framed as per requirement of Clause 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) to ensure that necessary Records and Documents of the Company are adequately protected and maintained and to ensure that the Records and Documents which are no longer needed or are of no value are discarded at the proper time. Records and Documents are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual, legal or regulatory requirements or for other purposes as may be set forth below. Records and Documents that are no longer required, or have satisfied their required periods of retention, shall be destroyed.

3. Definitions

“**Authorized Person(s)**” means and includes any Key Managerial Personnel, Head of any Department within the Company or any other person authorized by or on behalf of the Board under the Policy.

“**Board**” means Board of Directors of the Company.

“**Books of Account**” means books of account as defined under the Companies Act, 2013

“**Employee(s)**” employee(s) means employee (s) of the Company and includes officers and directors of the Company.

“**Key Managerial Personnel**” means key managerial personnel as defined under the Companies Act, 2013

“**Policy**” means Records Retention Policy.

“**Records and/or Documents**” includes records and documents in paper or electronic form. E-mail messages also forms part of Records and Documents.

Words and expressions used and not defined in this code but defined in the Companies Act, 2013 and rules and regulations made thereunder or Listing Regulations shall have the meanings respectively assigned to them in respective legislation.

4. Applicability

This Policy shall apply to all Records and Documents of the Company, whether maintained in physical or electronic form.

5. Policy

5.1 Employees must retain the Records and Documents listed in the schedule below for the periods of time set forth in that schedule. The schedule reflects Company’s obligations for Records and Documents retention. The information listed in the schedule is intended as a guideline and may

not contain all the Records and Documents, the Company may be required to keep in the future. Questions regarding the retention and destruction of Records and Documents, not listed in the schedule, should be directed to the concerned Authorized Person and the same will be dealt with as per instruction of the Authorized Person.

S. No.	Type of Record/Document	Minimum Retention Requirement	Remarks
Documents to be retained permanently			
1	Minutes of Board/Committee/Shareholders meetings	Permanently	
2	Statutory Registers and records, Annual Reports including Financial Statements required to be maintained by the Company under the Companies Act, 2013 or any other previous company law and Bye-Laws of the Company	Permanently	
3	Trademark registrations, copyrights, licenses and other Intellectual Property Rights, if any.	Permanently	
4	Property Records	Permanently	
Documents to be preserved for at least 8 years			
5	Tax records and documents including, but not be limited to, income tax returns, Income Tax notices, assessment orders, documents concerning proof of deductions, business costs and the Company's revenues.	8 years from the end of the assessment year or until the assessment is complete, whichever is later	
6	Books of Accounts	8 years	
7	Agenda of Board/Committee meetings and related papers	8 years	
8	Copies of all annual returns filed and copies of certificates / documents annexed thereto under the Companies Act, 2013 or any other previous company law	8 years from date of filing with ROC	
9	Legal files, records and documents	8 years	Court Orders must be preserved permanently. Further, Legal Counsel/Head may increase the retention period of any particular document.
10	Insurance records such as accident reports, claims etc	Accident and claim records to be retained until the income-tax assessment for the corresponding year is complete. Expired insurance policies shall be preserved only for 3 years	

11	Regulatory Filings/correspondence with Reserve Bank of India, Ministry of Corporate Affairs or any other regulatory authority or any Government department/Authority	8 years from date of filing/correspondence	
Others			
12	All books and documents relating to the issue of share certificates, including the blank forms of share certificates	30 years and in case of disputed cases, preserved permanently	
13	Records and Documents maintained under Prevention of Money Laundering Act, 2002	5 years from the date of transactions	
14	Marketing and Sales documents	3 years	
15	Contracts	3 years from date of termination of contract	
16	Employment Records/Personnel Records	8 years from the date of resignation of concerned employee. However, master information of employee to be retained permanently.	
17	Documents/ Information Hosted on the Website of the Company as Per SEBI Regulations	Disclosure of Material Events shall be hosted and retained on the Company's Website for a minimum period of 5 years.	After 5 years documents to remain hosted on the website of the company or can be removed from the website depending upon its nature, materiality, impact and relevance of material event/information.

5.2 Where permitted by law, any Record or Document that has originated in physical form may be converted to electronic form and preserved electronically if more convenient. The retention period electronic mail and electronic documents including Microsoft Office files and PDF files will depend upon the subject matter of the e-mail or electronic document, as covered in schedule of Clause 5.1.

5.3 Where any Records or Documents are maintained on behalf of the Company by a third party (such as a service provider, consultant, advisor, etc.), the Company shall require such third party to maintain such Records or Documents for the duration required under this Policy and shall ensure that such Records or Documents are accessible by the Company.

5.4 Records and Documents (a) that have been kept for the required periods of retention; and/or (b) are no longer required, may be destroyed with the approval of concerned Authorized Person. Details regarding the destruction of Records and Documents shall be preserved permanently which will include the type of Record or Document destroyed, date on which it is destroyed, place at which it is destroyed, name and designation of Authorized Person approving the same, name and signature of person who has destroyed the Record or the Document.

However, Records and Documents mentioned in Sr. No 7 in schedule of Clause 5.1 will be destroyed with prior approval of the Board.

5.5 Notwithstanding anything contained in Para 5.1, any Records and Documents required to be kept or maintained for a longer duration under any law shall be maintained for such longer duration.

5.6 The Authorized Person, on his or her own or on advise of any Employee, may require that the destruction of any Records or Documents be suspended due to pending, or reasonably foreseeable litigation, audits, Government or regulatory investigations, or similar proceedings. Once Employees are informed by the Authorized Person in this regard, Employees should not discard any records or documents relevant to the subject matter.

5.7 Failure to follow this policy may result in possible disciplinary action against responsible individuals, up to and including termination of employment.

This Policy shall be communicated to all operational employees and other concerned persons of the Company.
