



## **Krebs Biochemicals & Industries Limited**

### **Policy on Preservation of Documents**

#### **1. Preamble:**

Pursuant to Regulation 9 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred to as “the Regulations”) every listed company shall frame a policy on preservation of documents. This policy inter alia provides for preservation of documents where such preservation shall be of permanent nature and also documents with preservation period of not less than 8 years after completion of relevant transactions to which such documents relates.

#### **2. Objective:**

To facilitate efficient and effective operation of our Company, we are implementing the following policy on document preservation. All business records should be kept no longer than the period necessary for the proper conduct of Company Business. This policy shall cover all business records of the Company, including written, printed, recorded matter and electronic forms of records.

The records are classified into two categories:

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

#### **3. Definitions:**

- a) Act: Act means the Companies Act, 2013 including any amendment or modification thereof.
- b) Board: Board means the Board of Directors of the Company.
- c) Company: Company means Krebs Biochemicals & Industries Limited.
- d) Document: “Document” means all business records of the Company in written, printed and recorded matter and electronic forms of records and includes summons, notice, requisition, order, declaration, form and register, whether issued, sent or kept in pursuance of the Companies Act 2013, SEBI Act 1992 or under any other law for the time being in force or otherwise, maintained on paper or in electronic form;
- e) Employees: Employees shall mean the employees and office bearers of the Company, including but not limited to Executive Directors.



- f) Regulations: Regulations shall mean SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
  - g) Any other term not defined herein shall have the same meaning as defined in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, Companies Act, 2013, Securities Contract Regulation Act or any other applicable law or regulations.
4. **Governing Laws:** This policy shall be governed by the Companies Act, 2013, SEBI Act, Rules and Regulations, Secretarial Standards, Labour Laws, Tax Laws and all other applicable laws for the time being in force.

5. **Classification of documents:**

The Documents shall be classified in the following categories:

- Mandatory under governing laws.
  - Non-mandatory.
- a) Documents which are required to be mandatorily preserved for a stipulated minimum period of time under governing laws shall be preserved accordingly. Documents in respect of which no minimum timeline is stipulated under any of the laws shall be preserved in accordance with this policy.
  - b) All records and documents as provided herein shall be preserved for such time and period as may be provided herein.
  - c) Any change in governing laws affecting the change in period of preservation of documents shall prevail over this policy.
6. **Preservation of documents/ records.**

Subject to Clause 5 above, the retention of documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors as the overseeing authorities deem fit.

- a) **Tax & Accounting Records:** Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions and other documents concerning the Company's revenue and expenses including capital expenditure. Tax records should be retained for at least eight years from the date of filing the applicable return or such period of time as prescribed under Tax Laws.



b) **Employment records / Personnel records:** Labour laws require the Companies to maintain certain recruitment, employment and personnel information. The Company should also maintain personnel files that reflect performance reviews if any and any complaints brought against the Company or individual employees under applicable labour laws. The Company should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file.

- Employment and personnel records shall be preserved for a minimum period of six years irrespective of whether such employee continues to be employed with the Company or not.
- Returns under various labor laws, governmental and statutory filings etc. need to be retained in accordance with the related statute as may be specified therein.

c) **Financial Statements , Minutes, Statutory Registers & other documents:**

Financial Statements including Audit Reports, Minutes of Meetings of Board, Members and other Committees Meeting along with statutory registers as prescribed under governing laws for time being in force shall be preserved for such period as provided in respective laws. Any document where preservation period is not prescribed under governing laws shall be preserved for a minimum period of eight years.

d) **Press Releases/ Public Filings:**

The Company should retain copies of all press releases and documents filed with Stock Exchanges, Registrar of Companies and other regulatory authorities on a permanent basis.

e) **Legal Files/ documents:** All legal documents / copies of notices / summons / orders/ judgements and all other legal documents shall be preserved for a period of 8 years or till the completion of legal case, whichever is later.

f) **Marketing and Sales Documents:**

The Company shall maintain the documents relating to marketing and sales documents for a period of 8 years.

g) **Development/ Intellectual property and Trade Secrets:**

Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to the Company and are protected as a trade secret where the Company:



- i. Derives independent economic value from the secrecy of the information; and
- ii. The Company has taken affirmative steps to keep the information confidential.

The Company should keep all documents designated as containing trade secret information at least the life of the trade secret.

h) **Contracts:** Final Execution copies of all contracts entered into by the Company should be retained. The Company shall retain the copies of the final agreements or contracts for at least 3 years beyond the life of the agreement, and longer in case of publicly filed contracts.

i) **Electronic Mails:** Email that needs to be saved should be either:

- Printed in hard copy and kept in appropriate file ; or
- Downloaded to a computer file and kept electronically or on disk as a separate file so as to ensure its timely retrieval.

#### 7. **Amendments to the policy:**

Any amendments or modifications thereon, as may be required from time to time, in the policy shall be approved by the Board of Directors and shall have effect from the date of such amendment.