

## **MMF Policy on Preservation of Documents and archival of documents in website**

### **1. Purpose and Scope**

The purpose of this documents to present a policy statement for M M FORGINGS LIMITED ( MMF) regarding preservation of its documents 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 policy is intended to define MMF’s preservation of documents responsibilities and to provide guidance to the executives and staff working in MMF.

This policy has been adopted and approved by the Board of Directors at its meeting held on 07 November, 2015.

This policy is divided into two parts. First Part consists of Preservation of Documents. The Second part consists of Archival of documents in its website

### **PART I- preservation of documents**

#### **2. Principle of Responsibility of Employees for Preservation of Documents**

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.

#### **3. Periodical Review of the Policy by Top Management**

The policy may be reviewed by the Top Management and amendments shall be effected, subject to the approval of the Board

#### **4. 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 MMF 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. The Top Management in such case shall inform all the employee by mail, the need to retain the documents and suspension of disposal of the same.

**1. Accounting and Finance records including Annual Financial statement-  
- FINANCE AND ACCOUNTS DEPARTMENT**

Record Type	Retention Period
Annual Audit Reports and Financial Statements	Permanent
General Ledger	8 Years
Investment Records	8 Years
Tax-Exemption Documents and related correspondence	8 Years
Excise Tax records	8 Years
Tax Returns – Income, Property	8 Years
Annual Information Returns – State and Central	8 Years
Accounts Payable ledgers and schedules	8 Years
Accounts Receivable ledgers and schedules	8 Years
Annual Audit Records, including work papers and other documents that related to the audit	8 years after completion of audit
Audits and Adjustments	8 Years
Bank Statement and Cancelled Cheques	8 years
Employee Expense Reports	8 years
Interim Financial Statements	8 years
Notes Receivable ledgers and schedules	8 years
All tax records- income tax, sales tax etc	8 years
Tax Bills, Receipts, Statements	8 years
Tax workpaper packages - Originals	8 years
Sales Tax Records	8 years
Any document pertaining to any Income tax hearing	3 years after the case gets over
Service Tax Records	8 years

**2. Project records – PROJECT DEPARTMENT**

Annual Plans and Budgets	3 years after the budget year is closed
The retention period of any other document, paper as may be required , will be decided by the Head of the Department in consultation with MD	

**3. Insurance Records – MDO DEPARTMENT**

Record Type	Retention Period
Claim Files (Including correspondence, medical records, injury documentation, etc.	Permanent
Group Insurance Plan	Permanent
Insurance Policies for the Company	Permanent
Releases and Settlements	Permanent
Group Insurance Plans – Active Employees	8 years
Journal Entry Support Data	8 years

#### 4. Human Resources Records – HR DEPARTMENT

Record Type	Retention Period
Retirement Records	8 years after retirement
Personnel Files of individual employees	Permanent
Commission / Bonuses / Incentives / Awards	8 years
Payroll Tax records	8 years
Employee Deduction Authorization	3 years after termination of service of employment
Payroll Deductions	3 years after termination of service of employment
Labour Distribution Cost Records including details regarding gratuity and retirement benefits	3 years after termination of service of employment
Payroll Registers (Gross and Net)	3 years after termination of service of employment
Time Cards / Sheets	5 years
Leave Records	5 years after the relevant period
Employee Earnings Records	3 years after termination of service of employment
Employee Medical Records	3 years after termination of service of employment
Attendance records, application forms, job or promotion records, performance evaluations, termination papers, test results, training and qualification records, enquiry related papers ( electronic mode)	3 years after termination of service of employment
Employment Contracts - Individual	3 years after termination of service of employment for Plant
The retention period of any other document, paper as may be required , will be decided by the Head of the Department in consultation with MD	

## 5. Marketing Records- MARKETING AND PURCHASE DEPARTMENT

Record Type	Retention Period	Document Type
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents	8 years	Doc – 2
The retention period of any other document, paper as may be required , will be decided by the Head of the Department in consultation with MD		

## 6. Engineering records

Record Type	Retention Period	Document Type
Engineering designs in electronic mode accepted by the clients	Permanent	Doc - 1
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documents	8 years	Doc – 2
The retention period of any other document, paper as may be required , will be decided by the Head of the Department in consultation with MD		

## 7. Corporate records – LEGAL AND COMPANY SECRETARY

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
Court Orders	Permanent	Doc – 1
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent	Doc – 1
Records on CSR Projects(including amount budgeted, spent and balance if any) projects undertaken and progress thereon	Permanent	Doc – 1
Original Purchase / Sale Deeds	Permanent	Doc – 1

Annual Reports	Permanent	Doc -1
Litigation files	1 year after expiration of disposal of the case	Doc – 4
Original Lease Agreements	3 years after expiration of the lease	Doc – 6
ROC Filings and Stock Exchange filings in physical and Electronic form	5 years from the date of filing	Doc - 6

**8. Records pertaining to other Departments**

The retention period of any other document, paper as may be required , will be decided by the Head of the Department in consultation with MD		
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## **PART TWO - Archival of documents in its website**

### **9. Electronic Documents including email retention and back up**

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.
- Computer department would archive email for six months after the staff has deleted it after which time the email will be permanently deleted.
- 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 MD.
- Staff will take care not to send confidential / proprietary information to outside sources.
- Any e-mail that the staff deemed vital to the performance of their job should be copied to the staff's specific folder and/or printed and stored in the employees' workplace.

### **10. 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 or lack of it.

### **11. 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 Computer. 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. Records**

Record Type	Retention Period
Consultant Reports	3 years
Policy and procedures manuals – Original	Current version with revision history
Policies and procedures manuals - Copies	Retain current version only
Dealership agreements, if any	Current version with revision history

