



## **Policy for Preservation of Records of Escorts Kubota Limited (formerly Escorts Limited)**

### **INTRODUCTION**

The Board of Directors (the “Board”) of Escorts Kubota Limited (the “Company”) has adopted the following Policy for Preservation of Records of the Company (the “Policy”). The Board may review and amend this Policy from time to time.

### **OBJECTIVE**

This Policy is framed in accordance with the requirement of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “Regulations”) and is intended to provide the systematic review, retention, and destruction of documents received or created in the course of business.

### **APPLICABILITY**

This Policy is applicable to the Company and all corporate/ business operations of the Company.

### **DEFINITIONS**

- a. “**Act**” means the Companies Act, 2013
- b. “**Applicable Law**” means any law, rules, circulars, guidelines or standards binding on the Company, under which the preservation of the Documents has been prescribed.
- c. “**Authorised Person**” means the functional head of the concerned department or any other person duly authorised by the Board or any of the Managing Director(s) of the Company.
- d. “**Board**” means the Board of Directors of the Company.
- e. “**Company**” means Escorts Kubota Limited.

- f. **“Document(s)”** refers to documents, writings, papers, notes, agreements, deeds, contracts, summons, notices, advertisements, requisitions, orders, declarations, forms, correspondence, minutes, indices, registers and or any other record/s maintained by the Company, whether issued, sent, received or kept in pursuance of the Act or under any other law for the time being in force or otherwise, maintained on paper / print form or in Electronic Form and does not include multiple or identical copies.
- g. **“Electronic Record(s)”** means the electronic record as defined under clause (t) of sub-section (1) of section 2 of the Information Technology Act, 2000
- h. **“Electronic Form”** means any contemporaneous electronic device such as computer, laptop, compact disc, floppy disc, space on electronic cloud, or any other form of storage and retrieval device, considered feasible, whether the same is in possession or control of the Company or otherwise the Company has control over access to it.
- i. **“Preservation”** means to keep in good order and to prevent from being altered, damaged or destroyed, other than as permitted by this Policy.

Any Capitalized term used herein but not defined shall have the meaning assigned to such term under the regulations or any other applicable law or regulation.

### **RETENTION PERIOD**

Documents shall be retained in the following manner:

<b>S. No.</b>	<b>Retention Period</b>	<b>Type of Record</b>
1	Documents which are required to be preserved permanently	<ol style="list-style-type: none"><li>1. Registration/ Incorporation Certificates, Licenses and any other statutory approvals</li><li>2. Memorandum and Articles of Association of the Company</li><li>3. Minutes of Board Meetings, Committee Meetings and General meetings</li><li>4. All the Register as per the Act</li><li>5. Agreements with the Stock Exchanges, Depositories and other Authorities</li><li>6. Investment documents of</li></ol>

		<p>Subsidiaries and Associates</p> <ol style="list-style-type: none"> <li>7. Orders issued by Courts and other Statutory Bodies</li> <li>8. Documents pertaining to real estate, title documents</li> <li>9. Any other documents as prescribed under the applicable law</li> </ol>
2	Documents which are required to be preserved for a minimum period of 8 years	<ol style="list-style-type: none"> <li>1. Books of accounts</li> <li>2. Income Tax returns and tax records</li> <li>3. Agenda and other related papers shared with Board of Directors for Board/Committee or General meetings as required to be kept as per applicable law.</li> <li>4. Disclosure of Interest received from Directors and Senior Management</li> <li>5. Annual Returns</li> <li>6. Correspondence with shareholders and Statutory Bodies</li> <li>7. Other material contract and /arrangements</li> <li>8. Any other documents as prescribed under the applicable law.</li> </ol>
3	For a maximum period of 3 years	<ol style="list-style-type: none"> <li>1. All emails having escorts domain email id i.e. escorts.co.in</li> <li>2. Any other documents as prescribed under the applicable law.</li> </ol>
4	Any other Documents	As may be decided by the Authorised Person from time to time or as may prescribed under any Applicable Law for the time being in force, whichever is more.

The Company shall maintain a register of disposal of records in the custody of the compliance officer of the Company, wherein the brief particulars of the records disposed of shall be entered.

### **PROCEDURES**

1. The respective department shall be responsible for establishing procedures for handling, retrieving and systematic destruction of Documents.
2. Each department shall nominate an individual responsible for co-ordination and implementation of the Policy.
3. Documents which have completed their retention period shall be disposed-off by the nominated authorities of the respective department.
4. **Suspension of destruction** – If there is any actual or potential litigation or dispute or order by an administrative or judicial authority, the Documents relating to such litigation, dispute or order (“Suspended Documents”) shall not be destructed. Such Suspended Documents shall be retained until released by Head of Legal Department.
5. The respective department shall maintain the following details in respective of destroyed Documents:
  - a. Particulars of Document
  - b. Date of Destruction
  - c. Reason for Destruction
  - d. Name of Owner of Document
  - e. Name and Designation of authority approving destruction

### **SCOPE AND LIMITATION**

In the event of any conflict between the provisions of this Policy and the Regulations or any other statutory enactments, the statutory enactments shall prevail over this Policy.

### **AMENDMENTS AND UPDATES**

The Board shall review periodically this Policy and shall also have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision or replace this Policy entirely with a new Policy. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and further the objective of good corporate governance.

This Policy in whole or in part, shall stand modified/ amended from time to time, without any further act on the part of the Company, as and when there would be any statutory modification(s)/ amendment(s)/ revision(s) to the applicable provisions thereto.

**ESCORTS KUBOTA LIMITED  
(Formerly Escorts Limited)**

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