



PRESERVATION AND ARCHIVAL POLICY

As required by the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI Listing Regulations) the Company is required to have a 'Policy for Preservation and Archival of Documents' (policy), approved by the Board of Directors.

Various functions and manufacturing units create or receive various documents during the course of their daily routine. These documents and records are valuable historical resources, which will be retained in perpetuity or for certain period. Their care and preservation for the use of present and future generations is the principal responsibility of this policy document.

This policy is intended as an internal statement of the principles and procedures which underlines all aspects of collection, care, access and their use. It aims to explain to users the standards that we follow, and the procedures which are necessary to protect the documents and records in our custody and to ensure their continued availability and authenticity either in hard copy format or soft copy either disclosed on the website or stored elsewhere.

The policy covers the traditional physical formats currently held by various functions and factories such as including; paper, photographs, catalogs, slides, maps, microfilms, etc., It also covers digital formats such as including; email, computer files, data card, hard disk, etc., Preservation is the use of active measures for the protection of records or document. This is achieved by providing appropriate environmental conditions, storage facilities, employing safe methods of handling and suitable safeguarding.

Operational Context

The operational and functional heads recognize their responsibility in preserving the important documents, including their responsibility to demonstrate effective preservation of Company's archives, and special collections.

Preservation principles

It is only through preservation that continued availability and access to items in the collections can be maintained. Preservation is therefore an integral part of all our functions, and the following principles underlie strategic planning:

- Wherever possible, the documents and records will be preserved in their original formats as well as these documents can be converted into digitalization from. Each function shall determine the nature of the documents to be preserved and the period of their preservation, either permanent or for a period of eight years or more and less than 8 years as per the statutory requirement of their importance. Each function head will be responsible for adhering to the preservation of their respective identified documents.
- Appropriate conservation measures will be taken considering the needs, value, significance, and usage of the item in question, and be within the constraints of budgets, staffing and other resources.
- Duplicates will be created where it is appropriate to protect the original, and to allow wider access to the content. Duplicate will not replace the original, which will still need preservation.



Collection care

All staff and employees of the Company are made aware of the paramount importance of preservation and will be trained on safe handling of documents, books and other archival materials. All activities, from acquisition to access, are informed by the need to ensure that collections are in a fit state to be handled and that the risk of their deterioration over time is minimized.

When deemed appropriate, certain elements of both preservation and conservation are outsourced to suppliers who meet the relevant standards.

Security

With the exception of few documents with the approval from the functional heads, all documents and records held by the function and factories will be kept in closed access storage. This store is accessed only by staff member and authorized officials. Where others exceptionally need access (for cleaning, maintenance etc.), these personnel are accompanied.

Storage and accommodation

Storage of suitable dimensions and strength for the different formats of documents and records will be maintained. Regular cleaning is undertaken, supervised by staff, and regular checks made for possible infestation by harmful insects.

Duplicate copies

Duplicate copies of documents and records are made where appropriate, to limit handling of the originals. This will normally be for reasons of heavy demand, exceptional fragility, potential future degradation or deterioration, or in response to particular need. Duplicate may be created in a range of formats - microfilm, photographic, photocopies, or digital - depending on what is most appropriate in the circumstances.

Archival of documents on website

As required by the SEBI Listing Regulations, 2015, and any future statutory amendment as may be applicable, all the events and information which has been disclosed to the Stock Exchange(s), where Company's securities are listed, shall be hosted on the website of the Company for a minimum period of Five years and thereafter the documents be preserved in accordance with this policy.

Disposal of the Documents

The Company's Factory, Sector, Function heads respectively will be responsible for the ongoing process of identifying the records, which have met the required retention/preservation period and overseeing their destruction. The mode of Destruction of confidential documents will be shredding only. There will be a complete record maintained for the documents destroyed/disposed off.

In case of any indication of an official investigation or when a lawsuit is filed or appears imminent, Document destruction will be suspended immediately. Destruction will be reinstated upon conclusion of the investigation.



Policy Review

The policy will be reviewed annually in April. Revisions if any will be approved by the Managing Director of the Company will be incorporated.

Place: Pune
Date: 31st December, 2015

Chairman